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Agriculture**

**Forest Service**

**Northern Region**

**Idaho Panhandle  
National Forests**

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## **Coeur d'Alene River Ranger District**

# **Blue Alder Resource Area Decision Notice**

*Under Authority of the Healthy Forests Restoration Act*



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# BLUE ALDER RESOURCE AREA

## Decision Notice

Idaho Panhandle National Forests  
Coeur d'Alene River Ranger District

Responsible Official:  
Ranotta K. McNair, Forest Supervisor

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### 1. Introduction to the Project

#### 1.1. Healthy Forests Restoration Act Authorization

The Blue Alder Environmental Assessment has been conducted under the authority of the Healthy Forests Restoration Act (HFRA, Public Law 108-148). Passed in December 2003, the HFRA provides improved statutory processes for hazardous fuel reduction projects on certain types of at-risk National Forest System (NFS) lands and also provides other authorities and direction to help reduce hazardous fuels and restore healthy forest and rangeland conditions on lands of all ownerships. The National Fire Plan, coupled with the Federal Wildland Fire Management Policy (National Fire Plan, 2001), forms a framework for Federal agencies, States, Tribes, local governments, and communities to reduce the threat of fire, improve the condition of the land, restore forest and rangeland health, and reduces risk to communities.

The Blue Alder Resource Area project is the latest of a series of projects on the Coeur d'Alene River Ranger District designed to respond to the National Fire Plan and other direction emphasizing fuel reduction and reducing the risks that uncontrolled fire poses to communities. The National Fire Plan and HFRA emphasize collaboration with communities and other agencies; the Blue Alder project was originally conceived out of collaboration with the Kootenai County Wildland Urban Interface (WUI) Task Force, and has gone through extensive collaborative efforts, which are described in section 1.3 below and in EA Appendix G.

#### 1.2. Overview of the Resource Area

The Blue Alder Resource Area is located within Kootenai County, Idaho, approximately 9 air miles east of Coeur d'Alene, Idaho (see Figure DN-1) which was listed as a community at risk in the Federal Register on August 17, 2001. It lies entirely within the wildland urban interface as defined by the Kootenai County WUI Task Force and documented in the Kootenai County WUI Fire Mitigation Plan. The project area consists of National Forest System lands in the drainages of Blue Creek, Wolf Lodge Creek, Cedar Creek, and Alder Creek, which drain into Coeur d'Alene Lake. The main access points into the resource area are Forest Roads 202, 499, and 413 via Interstate 90, and county roads 119 and 120. The resource area is approximately 13,800 acres in size and is immediately adjacent to, but does not include, lands owned by Forest Capital, State of Idaho, and other private ownership. The resource area is predominately a southern aspect but portions can be found to have all aspects. Elevation of the resource area ranges from 2,400 feet at the low end and reaches to almost 4,200 feet at the high end. The project area is located in T49N R2W Section 6; T49N R3W Sections 1-4, T50N R1W Sections 31, 32; T50N R2W Sections 1-15, 17, 18, 20-26, 35, 36; T50N R3W Section 14; T51N R3W Sections 31-33 B.M.

The environmental assessment references the Land and Resource Management Plan for the Idaho Panhandle National Forests (PF Doc. CR-002) which sets the direction for managing the resources of the Forest. For clarity, that document is referred to simply as the "Forest Plan." The Forest Plan is one of many documents that provided guidance and contributed to the development of this project. Other documents include:

- *USDA Forest Service Strategic Plan for Fiscal Years 2007-2012 (PF Doc CR-030)*
- *Integrated Restoration and Protection Strategy in the Northern Region (PF Doc. CR-031)*
- *Northern Region Overview Detailed Report (1998, PF Doc CR-032)*
- *2001 National Fire Plan (PF Doc. CR-033); Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment 10-Year Comprehensive Strategy, 2006 (PF Doc. CR-034)*
- *Interior Columbia Basin Strategy (PF Doc. CR-035)*
- *Coeur d'Alene Geographic Assessment (PF Doc. CR-025)*
- *Kootenai County Wildland Urban Interface Fire Mitigation Plan (PF Doc. CR-036)*

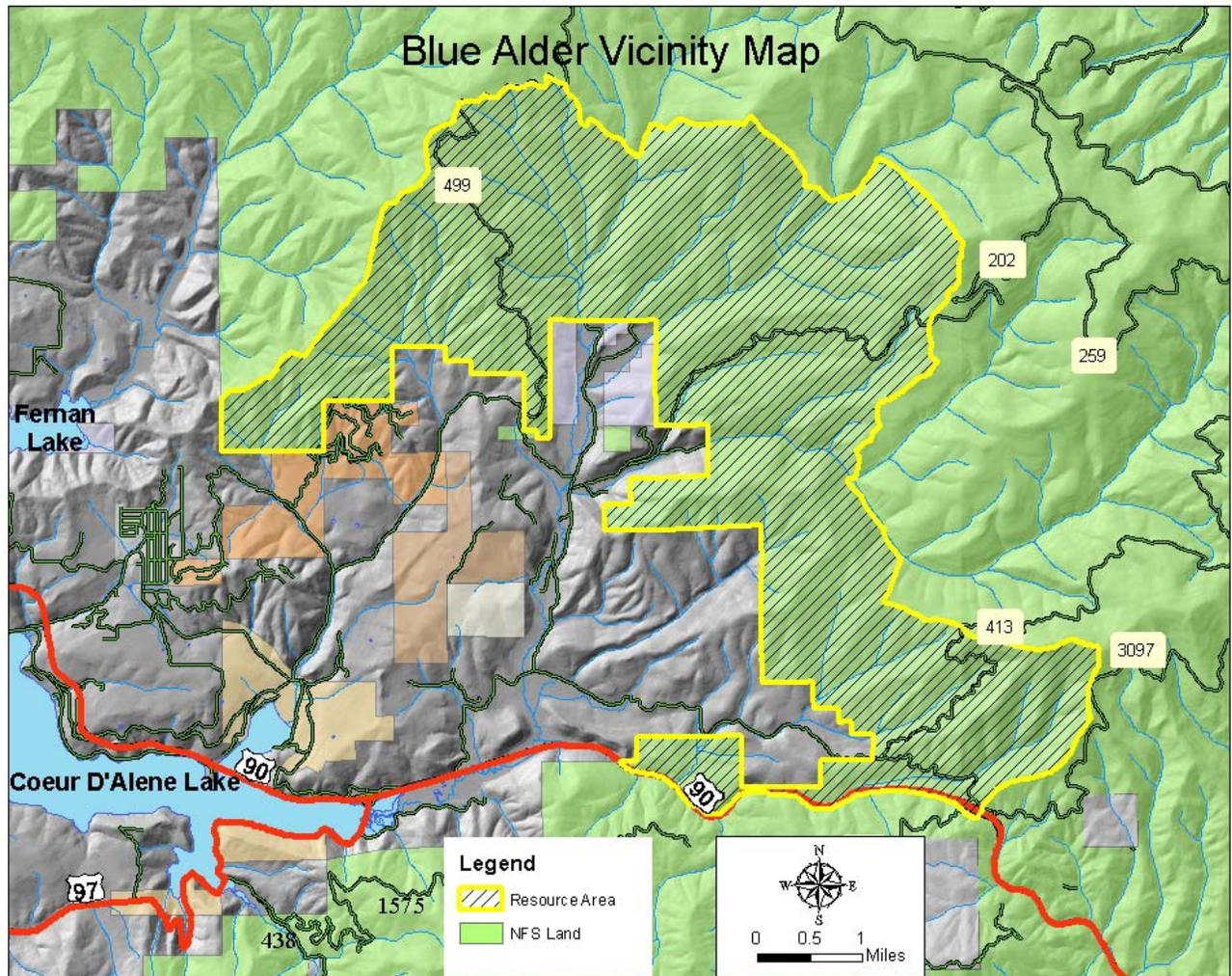


Figure DN-1. Vicinity map of Blue Alder Resource Area.

### 1.3. Collaboration and Public Involvement

Recent agency direction and the spirit of the Healthy Forest Restoration Act have placed a focus on working collaboratively with interested and affected publics in developing projects to address hazardous fuels concerns in the wildland urban interface and risks to associated communities. In 2005, the Coeur d'Alene Chamber of Commerce, in cooperation with the Idaho Panhandle National Forests, sponsored a facilitated collaborative forum which evolved into the Coeur d'Alene Forestry Coalition. The premise was to create an opportunity for early and continuous public involvement in development of vegetative management projects, rather than more traditional approaches that typically ended in appeal or litigation. From its inception, the Coalition invited participation from a wide range of interests, including Federal and State agencies, environmental/conservation organizations, timber industry, local officials and other interested stakeholders. Eventually, the Coalition engaged the Forest Service in dialogue about forthcoming projects, and opportunities to openly collaborate on them.

The Coalition committed to working with the Forest Service on management needs and opportunities in the Blue Alder Resource Area on the Coeur d'Alene River Ranger District. Over the last two and a half years the Coalition participants have engaged the Forest Service in development of the project and analysis documented in this decision and the supporting EA. The collaborative journey has included numerous public meetings and field trips, focusing on information exchange, educational forums, and a candid look at the project development and analysis process from inception to decision.

In addition, the Forest Service used more traditional public involvement procedures for those unable or unwilling to participate in the collaborative process, including two scoping notices that were mailed to interested and affected parties in December 2007 and again in March 2008. Those providing comment on the scoping notice or indicating

continuing interest in the project received a copy of the Blue Alder Resource Area HFRA EA in June 2008 and were provided a 30-day period to file objections as provided for in the HFRA legislation.

Information exchanged through both collaborative and other public involvement efforts shaped the evolution of the Blue Alder Resource Area HFRA project in numerous ways. We have highlighted some of these:

- The development of a common understanding of the purpose and need for the project; why here, why now? The three primary premises for the project based on an assessment of existing conditions in contrast to desired conditions arising from the Forest Plan and other higher order direction were to:
  - ♦ *Reduce fuels in the wildland urban interface*
  - ♦ *Establish and maintain long-lived early seral species and resilient structure*
  - ♦ *Maintain and improve dry-site wildlife habitat and big game habitat*

Collaborative discussions with Coalition participants and input from public scoping raised other opportunities and/or concerns within the Blue Alder Resource Area that warranted further consideration:

- ♦ *Unauthorized motorized access and illegally pioneered trails*
  - ♦ *Water quality and peak flows in the Lower Wolf Lodge Basin*
  - ♦ *Visual effects of using regeneration harvest practices*
  - ♦ *Road densities relative to wildlife and aquatic resource values*
- The prioritization of a range of management opportunities to address the preceding purpose and need statements and opportunities, including 679 acres of prescribed fire to reduce hazardous fuels, 295 acres of prescribed fire to improve wildlife habitat and reduce hazardous fuels, 257 acres of pre-commercial thinning to trend young plantations toward desired long-lived early seral species, 667 acres of stand rehabilitation to re-establish more resilient early seral species, and 1882 acres of commercial timber harvesting to reduce hazardous fuels and trend stands toward the desired mix of resilient seral species and other native species. In addition, 22 miles of roads no longer needed for management of the resource area were recommended for decommissioning and one stream crossing was identified for improvement. Twelve unauthorized motorized routes were also identified for closure.
  - The original range of management opportunities identified to address the purpose and need statements for the 13,800 acre Blue Alder Resource Area included 1882 acres of mechanical fuels reduction through commercial timber harvest. After discussions with Coalition participants on treatment priorities and concerns with new road construction, 350 acres and 2.5 miles of new road construction were dropped from further consideration. This adjustment was reflected in the Forest Service Proposed Action, Alternative 2.
  - Public feedback from previous projects as well as the collaborative process and scoping, raised concern with the use of even-aged management systems, such as clearcutting or seed tree cuts in large patches that left noticeable openings on the landscape. These methods have a proven track record to establish desired early seral species, but issue was raised with their visual impact. Through a series of meetings and field trips with Coalition participants and researchers from the Rocky Mountain Experiment Station, a silvicultural prescription was tailored to meet concerns over traditional systems. Using an irregular shelterwood system with variable retention, areas of no harvest (full retention) are integrated with partial cut areas (variable retention) and small openings across the treatment units. This concept is discussed more fully in the EA and later in this decision (Sec 2.3, pg-7).
  - The Proposed Action, Alternative 2, proposed 3.2 miles of new road construction to access priority treatment areas, but also included decommissioning 22 miles of existing road. The issue of new road construction remained a focal point of collaborative discussions and scoping comment. The Coalition invited an independent organization, Wildlands CPR (based in Missoula, Montana), to assess road management in the resource area. In general, their assessment determined that post-project open road densities appeared reasonable and the proposed new road construction segments were well located to minimize other resource concerns. The Forest Service and Coalition also sponsored two field trips to review the proposed road construction segments. Coalition participants were unable to reach agreement. A letter from them and other comment received during the scoping period asked the Forest Service to consider an alternative that did not involve new permanent road construction. The Forest Service developed Alternative 3, which proposed no new permanent roads, but also reduced acres treated by commercial timber harvest by an additional 243 acres.

#### **1.4. Purpose and Need for Action**

As discussed above and in Chapter 1 of the EA, the purpose and need for action in the Blue Alder Resource Area is to reduce hazardous fuels, establish healthy resilient forests, and improve wildlife habitat through vegetation management. The Resource Area is located in the wildland-urban interface as defined by the Kootenai County Fire Mitigation Plan; adjacent to private land, homes, and community infrastructure. A severe wildfire could result in the loss of structures and private land values, as well as environmental values such as forest cover, wildlife habitat, soil productivity, water quality, visual quality, and timber value.

HFRA has several purposes, one of which is “to enhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape.” In addition, HFRA strives to protect, restore, and enhance forest ecosystem components to improve biodiversity and enhance productivity and carbon sequestration. The following three objectives reflect the purposes of HFRA as they apply to the Blue Alder Resource Area:

➤ **Reduce hazardous fuels in the wildland urban interface.**

The Blue Alder Resource Area is in the WUI, and as such, uncontrolled wildfire poses a threat to life and property. Based on Kootenai County GIS data there are approximately 196 private structures within a mile of the Resource Area, with new development in the planning stages. Various infrastructure such as roads, power lines, a natural gas pipeline, and Interstate 90 are within or near the Resource Area. A deficit in the number of naturally occurring fires over the last 80 years in this area has led to increased fuel loading, changes in stand structure, and changes in species composition. Overall, this deficit has led to increased potential for large, intense, severe fires which could threaten lives and the wildland urban interface values which are particularly prevalent near the Blue Alder Resource Area. A severe wildfire could also result in the loss of environmental values such as forest cover, soil productivity, water quality and visual quality. Financial losses could include homes, timber value, and fisheries. Based on the current conditions, which have resulted from the exclusion of wildfire, and some past harvesting practices, there is a need to reduce fuels and increase early seral species such as western larch and ponderosa pine which will increase forest resiliency and reduce the wildland fire threat.

➤ **Establish and maintain long-lived early seral species and resilient structure.**

The vegetative patterns that currently make up the Blue Alder Resource Area have been influenced by climate, topography, fire, and human activity. Over time, some past harvesting practices, exclusion of wildfire, white pine blister rust, and other factors have significantly changed species composition from that which was found in the early 1900s. Currently, the Blue Alder Resource Area is dominated by Douglas-fir mixture and grand fir mixture forests (88% of the Resource Area), while long-lived, early seral species such as ponderosa pine, western larch and western white pine are in the minority (12% of the Resource Area). The forest structures in the Resource Area are also unbalanced – forest structures are heavily weighted towards large size classes, which should make up 40-55% of the Resource Area but are now at 80%. Medium size classes are rare in comparison to desired conditions, making up only 6% of the Resource Area compared to the 20-40% for desired future conditions. The most common vertical stand structure (42%) is in the “continuous stories” category, which represents stands with multiple stories and ages. The desired future condition is to have a dominance of single and two-story stands with fewer areas of three-story and continuous vertical structures.

To meet the goals and objectives of the Forest Plan, stands should trend from the current composition of late successional species (grand fir, Douglas-fir, western hemlock) towards long lived early seral species (ponderosa pine, western larch, western white pine) which are more fire resilient and are more resistant to insects and disease (Forest Plan, pg II-2, II-32). Patch size should increase to between hundreds to thousands of acres and incidence of insect and disease should be returned to endemic levels and no longer be the major agent of change.

➤ **Maintain and improve dry-site wildlife habitat and big-game habitat.**

The lack of long-lived, early seral species (particularly ponderosa pine) in the Blue Alder Resource Area is significant relative to wildlife habitat. Flammulated owls and pygmy nuthatches inhabit the same open, old ponderosa pine stands and rely on large diameter ponderosa pine for foraging and for nesting in cavities. Currently only 7% (990 acres) of the Resource Area provides habitat for the flammulated owl and pygmy nuthatch even though 28% of the resource area is potential habitat.

The desired future condition is for existing large diameter ponderosa pine to be maintained across the landscape habitat types, which are primarily on south and west facing slopes. These ponderosa pine stands would have a mixed grass understory, small patches of brush and multi-aged, Douglas fir, providing nesting and foraging habitat for the snag-dependent sensitive species, flammulated owl and pygmy nuthatches (Forest Plan, pg II-1, II-5, II-28). Favorable structure, composition, appropriate patch size, nesting and foraging habitat would be provided for snag-dependent sensitive species.

➤ **Other Opportunities**

In the process of gathering data for the Blue Alder Resource Area and conducting the requisite roads analysis, two other management opportunities were identified that could be effectively and efficiently addressed while meeting the primary needs identified above.

- ◆ **Road Decommissioning and Culvert Work:** The Roads Analysis Process (RAP) for the Blue Alder Resource Area (PF Doc. TRAN-1) identified 22 miles of road that were no longer needed for long-term management of National Forest lands (EA, p. 2-3). These roads were all field inventoried and found to have revegetated naturally, are currently impassable by motorized traffic, and for the most part are considered hydrologically stable. However, there are three existing culverts that need to be removed to reduce associated hydrologic risks. The Forest Service would update its databases to reflect the decommissioning of these 22 miles of road. The RAP also identified a need to upgrade a culvert that did not meet 100-year flood events on a road needed for long-term management.
- ◆ **Barriers to Illegal Travel:** The proximity of the Blue Alder Resource Area to the urban interface has also made it subject to the development of numerous unauthorized motorized trails (EA, pp. 2-3, 3-263). These routes are in conflict with the Coeur d'Alene River Ranger District Travel Plan which prohibits travel off of designated routes. In addition, these routes frequently parallel or cross streams that can adversely affect water quality and fish habitat. The closure of these routes is currently within the authority of the Forest Supervisor in compliance with the District's current travel plan. The actions developed in response to the preceding purpose and need may provide a timely and cost-effective opportunity to close these routes.

### **1.5. Alternative Development and Environmental Assessment**

Public interest and input were solicited through the use of area newspapers (legal ads and news articles), the IPNF Quarterly Schedule of Proposed Actions, letters to interested members of the public, meetings with the Coeur d'Alene Forestry Coalition and the public, and field trips to the area. More detailed information about these collaborative efforts and the comments received during scoping were provided in the May 2008 EA (Appendix G) and in the project record.

Development of alternatives was based on the existing condition of resources, the purpose and need, and issues identified by other agencies and the public (EA, Chapter 2 - Alternatives). Three alternatives were considered in detail. Although HFRA does not require agencies to develop a full no-action alternative (USDA Forest Service, 2004, p. 10), a no-action alternative was developed and analyzed in the EA. The No-Action Alternative analyzed for this project represents the effects of not implementing the proposed activities, as well as the effects of past, ongoing and reasonably foreseeable activities.

**Alternative 2** is the Proposed Action that was presented to the public during scoping. The proposed activities were identified through a comparison of existing and desired conditions for hazardous fuels, forest vegetation and wildlife. The alternative represents the expected future condition based on effects of proposed fuels reduction and stand improvement activities as well as past, ongoing and reasonably foreseeable activities.

**Alternative 3** was designed in response to concerns raised by the Idaho Conservation League (ICL) during scoping and by some participants in the Coeur d'Alene Forestry Coalition. Although the Coalition submitted a letter (Project Files, Public Involvement) generally supporting Alternative 2, they were unable to reach agreement on the construction of two permanent road segments and encouraged the Forest Service to consider an alternative

without them. ICL shared similar concerns. Alternative 3 does **not** include construction of these two new system road segments. Consequently, the acres treated under this alternative are also reduced, because current and projected market conditions do not support economic treatment of these areas by helicopter. All other proposed management activities included in Alternative 2 are included in Alternative 3.

Detailed descriptions of the alternatives, existing conditions, and environmental effects that would occur under each alternative were analyzed and documented in the Blue Alder Environmental Assessment (EA), which was mailed to the public in June 2008.

## **1.6. Objection Process**

The HFRA provides a pre-decisional administrative review process (referred to as the “objection” process) pursuant to 36 CFR 218, subpart A (it is not subject to notice, comment and appeal provisions pursuant to 36 CFR 215; see 36 CFR 218.3). The objection period began after release and distribution of the EA, as announced to the public by notification in the cover letter for the EA and through publication of a legal notice in the newspaper of record (Coeur d’Alene Press, Coeur d’Alene, Idaho) on June 3, 2008.

One letter of objection was received in a timely manner from Mike Mihelich on behalf of the Kootenai Environmental Alliance, Friends of the Clearwater, Idaho Sporting Congress, Alliance for the Wild Rockies and Selkirk Conservation Alliance. The District Ranger and representatives of the interdisciplinary planning team met with Mike Mihelich and Barry Rosenberg on July 25, 2008. The objectors concerns were primarily as follows: 1) whether the activities required under the Horizon EIS (1992) were completed or not; 2) the removal of fish barriers within the project area; 3) the improper use of HFRA because there would be harvest of “large” trees; 4) not properly disclosing the size of regeneration openings; 5) increase in water yields due to openings on the landscape; 6) the WATSED model does not take into account stochastic events; 7) treating fuels two miles away from structures does not help reduce risk of wildfire to those structures; and 8) some units exceeded soil standards under the Horizon logging.

There was no resolution to these concerns during the meeting, however several items were clarified. The District added project records from the Horizon Timber Sale that showed the completion of required activities to address concern #1. It was agreed by both parties not to address concern #2 regarding fish barriers, as this was a policy interpretation matter raised during the Deerfoot appeal and was being addressed by the Forest Service Regional Office. The Deerfoot project and decision has since been affirmed and the appellant’s appeal, including this issue was denied. The units that exceeded soils standards under concern #8 were not harvested under the Horizon sale, but were part of earlier logging that occurred prior to the Forest Plan and the implementation of standards for soils. A summary of the response to objections and additional citations are located in the Project File (Documents PI-31 through PI-32).

Reviewing Officer Kathy McAllister (USDA Forest Service, Northern Region) considered the Blue Alder Resource Area project, including relevant supporting records, and the objection. She determined that the project is in compliance with laws and regulations, and clearly demonstrates how the project is consistent with the HFRA, including use of a Community Wildfire Protection Plan, retention of large trees, and monitoring requirements (PF Doc. PI-31). As stated pursuant to 36 CFR 218.10(b)(2), this project is not subject to further administrative review by the Forest Service or the Department of Agriculture.

## **2. The Selected Alternative**

### **2.1. The Decision**

After considering public comment, the analysis provided in the EA, the project record, the objection process, the errata sheet (Attachment B), and Finding of No Significant Impact (FONSI), I have decided that **Alternative 3** will be effective at meeting the stated purpose and need in the Blue Alder Resource Area while addressing concerns brought forward through public involvement processes. Alternative 3 is hereafter referred to as the **Selected Alternative**. I have decided to implement these activities on lands managed by the Forest Service as described in the following tables and the enclosed Selected Alternative Map.

Table DN-1. Summary of activities on National Forest System lands under the Selected Alternative.

<b>Vegetative Treatment</b>	<b>Alt. 3</b>
Prescribed burning acres	950
Rehabilitation (Burn and Plant) acres	600
Timber harvest unit acres	1,279
<i>Variable Retention followed by burning and planting</i>	1,192
<i>Commercial Thinning harvest followed by burning</i>	87
Yarding method acres	
Helicopter	49
Skyline	624
Forwarder	156
Tractor	450
<b>Roads</b>	<b>Miles</b>
System road construction	0
Temporary road construction	1.2
Road Decommissioning	22
<b>Culverts</b>	<b>Number</b>
Culvert Upgrade	1
<b>Barriers to Illegal Travel</b>	<b>Number</b>
Improve Existing Barrier	7
Install Heavy Earth Barrier	4
Install Gate	1

## 2.2 Stewardship Contracting

Activities authorized under this decision document may be implemented using Stewardship Contracting authorities (EA, pp. 2-11, 3-262). The restoration emphasis of the activities and the collaborative involvement of stakeholders in the development of this project meet the intent of Stewardship Contracting (FSH 2049.19\_61.1). Forest Service Stewardship Contracting authorities allow monies received from the sale of forest products or vegetation removed under a stewardship contract to be applied at the project site or at another stewardship contracting project site without further appropriation. These funds can then be utilized to implement authorized actions that achieve other restoration objectives (EA, p. 2-11).

## 2.3 Specific Activities That Will Occur Under the Selected Alternative

### Prescribed Burning

Prescribed fire is used to approximate the natural vegetative disturbance of periodic fire occurrence. This vegetative management tool is used to maintain fire dependent ecosystems and restore those outside their natural balance. This prescribed fire is vital to the life cycles of fire-dependent forest lands. Prescribed fire is proposed on 950 acres. Prescribed burning has been proven effective at slowing large wildfire spread and at reducing wildfire severity. The prescribed burning would be conducted at times of the year when risk of escape is minimal and when soil productivity can be protected. Burns would be implemented in a manner that would protect and enhance wildlife habitat by maintaining open stands that are currently being encroached upon by ladder fuels and brush. Similarly, old brush fields that have grown to a height where ungulates can no longer reach palatable browse will be burned to regenerate shrubs. Prescribed burning would help restore stand structures more characteristic of dry-site stands shaped by periodic fire. Burning would be implemented in a manner that would comply with applicable regulations such as the Clean Air Act and the Inland Native Fish Strategy.

Prescribed burning will also take place in harvest units to reduce fuels and prepare the harvest units for regeneration. The prescribed burning outside of the harvest units have been designed to be adjacent to other treatments in order to maximize the effectiveness of fuels reduction and create large patch sizes. Additionally,

there is an existing fuel break on the ridge south of Marie Creek that will be maintained through prescribed burning as part of this proposal.

### **Commercial Timber Harvest**

Timber harvesting with fuels reduction and site preparation for planting will be used to re-establish long-lived and more resilient early seral species such as ponderosa pine, western larch, and western white pine which have declined significantly over the last 80 years and been replaced by less resilient Douglas-fir and grand fir. Harvest related activities are proposed within 1279 acres.

The silvicultural prescription for harvesting within 1,192 acres is a variable retention irregular shelterwood treatment. This prescription is more fully described on page 3-59 of the Environmental Assessment (see Attachment B). It is further discussed here to facilitate common understanding as a result of a field review of the prescription with Coalition participants and a representative of the Kootenai Environmental Alliance in August, 2008, and subsequent meetings.

Across the harvest treatment units, the prescription seeks to retain existing healthy early seral trees where they exist, and to create sites suitable for regenerating these same species where they do not. In general, the prescription seeks to integrate the following post-harvest conditions:

Areas of full retention, where no harvest activities occur. This will typically range from 35-45% of the treatment area.

- Areas of variable retention, where partial cutting is used to remove less desired late seral species (Douglas-fir and grand fir) and to sufficiently daylight the area to re-establish desired early seral species (ponderosa pine, western larch and western white pine). In these areas, approximately 11-30 trees per acre (favoring early seral species where present) would be retained, equating to approximately 20-45 square feet of basal area, and 10-35% canopy.
- Areas of small openings, where there are insufficient desired early seral species to retain. In these areas, 10 trees per acre or less would be retained. Based on cruise plots throughout treatment areas, these opening sizes are expected to be less than seven acres, except for Unit 48 where due to current poor stand condition the opening size is expected to be approximately 15 acres.

Given the variability of current species distribution across the Resource Area, this prescription seeks to take advantage of existing early seral trees where present, and convert other acres to more resilient species over time. We expect a mosaic of full retention areas within and adjacent to treatment areas, and partial retention and small opening components within treatment areas.

The other silvicultural prescription is a commercial thin on 87 acres, 33 of which are in allocated old-growth. For that portion not allocated as old growth, 75-100 overstory trees per acre would be retained favoring the healthiest and largest diameter species available with preference for ponderosa pine, larch, and white pine. Within the portion allocated as old growth, harvesting would be 'a commercial thin from below' to reduce hazardous fuels buildup in the understory component (EA, p. 3-60) that pose a risk to this stand and WUI values. The treatment area is adjacent to private lands, structures, Interstate 90, a natural gas pipeline, and power lines. With this development comes the risk of human-caused fires in addition to natural ignitions, either of which threaten WUI and forest values (EA pgs. 3-2, 3-60, 3-68). The proposed thin from below and fuels treatment would also be expected to increase resilience and maintain the very rare characteristics of this stand and maintenance of old growth characteristics over the long term (EA 3-60). The proposed activities in allocated old growth would not change old-growth allocation status (EA, pgs. 3-61, 3-68).



**Figure DN-2. Foreground, small opening; background, variable retention.**

Once the units have been harvested, prescribed burning would reduce fuels and prepare the regeneration units for planting of long-lived early seral species. The result of all of the timber harvest activities would be a reduction in hazardous fuels, a more balanced landscape with a greater number of younger stands, and a more resilient, sustainable, productive forest.

Timber harvesting will be completed using helicopter, skyline, and tractor yarding systems. All timber harvesting and road building (temporary) has been carefully planned to comply with all regulatory requirements such as the Forest Plan, Clean Water Act, Inland Native Fish Strategy, and the Endangered Species Act. Activities would be completed using Best Management Practices (BMP's). Measures to reduce the spread of noxious weeds, protect wildlife security and protect soil productivity are incorporated into the proposed action.

#### **Rehabilitation Activities**

Vegetative rehabilitation will be implemented on 600 acres to re-establish long-lived early seral species on stands which have deteriorated to the point of becoming brush fields. This rehabilitation will consist of prescribed burning to prepare the site prior to planting of ponderosa pine, white pine, and western larch. Portions of the units may need slashing prior to the burning.

#### **Road and Culvert Activities**

Harvest activities will require building 1.2 miles of temporary road. These roads will not be available for public use and will be recontoured after completion of the logging. Roads currently in storage that are needed for project implementation will be opened and have a variety of temporary stream crossings (culverts or bridges) and permanent structures (armored vented rock fords) applied to them. Gates will be installed to restrict public use during the life of the project. These roads will be returned to storage following reforestation activities. One culvert upgrade is necessary on road #359 to meet specifications for a 100-year flood event.

#### **Road Decommissioning Activities**

During the Roads Analysis Process for Blue Alder the interdisciplinary team identified 22 miles of roads that were no longer needed for long term management in the Resource Area. After field review, it was determined that many of these roads are currently brushed in and are considered hydrologically stable. Three culverts were identified that do need to be removed to fully decommission the roads. Appendix D in the EA displays a complete list of the roads and miles to be decommissioned.

#### **Barriers to Illegal Travel**

There are problems with illegally-pioneered trails in the Resource Area. Barriers will be used to discourage use of these illegal trails. Many of the targeted trails were pioneered to breach road closures, which in turn were put in place for a variety of reasons, including wildlife habitat security, maintaining watershed health and to provide a diversity of recreational experiences. The illegal trails decrease wildlife security and encroach on ridges, which serve as travel corridors for many animal species. In addition, the pioneered routes contribute to the spread of noxious weeds. Bringing an end to use of the pioneered trails will protect water quality, enhance wildlife security, protect habitat, and allow for a range of recreational experiences. Specific closure methods and location are in Appendix D.

## **2.4 Specific Features Designed to Protect Resources**

#### **Features Related to Fuels Management**

Surface or understory fuels in harvest units will be treated through the use of prescribed burning. Because post-harvest fuel conditions cannot be completely predicted, assessments would be made by a fire/fuels specialist and a silviculturist after completion of harvest activities. A determination would then be made as to whether the burn could be implemented safely and effectively without further fuels treatment, or if some modification of the fuels using other methods is required to meet the objectives of the silvicultural prescription. These methods could include slash piling, leave tree protection, or slashing.

#### **Features Designed to Protect Forest Vegetation**

Target stand descriptions and silvicultural diagnosis have been completed and approved by a certified silviculturist at the time of this analysis (PF Doc. VEG-3). All vegetative treatments will have silvicultural prescriptions approved by a certified silviculturist prior to treatment. Silvicultural prescriptions would consider site-specific factors such as the physical site, soils, climate, habitat type, current and future vegetative composition and conditions, as well as multiple resource objectives, NEPA decisions, other regulatory guidance, and Forest Plan goals, objectives and standards.

Treatments would meet white pine retention guidelines (USDA, 1994; PF Doc. VEG-R58). Harvest unit layout would consider suitability limitations on a site-by-site basis on the ground. Harvest and site preparation treatments would consider the potential short- and long-term negative effects (including tree blowdown, fire mortality, etc) of proposed activities on adjacent trees and stands with site-specific prescription modifications, such as change in unit boundary or modification of prescribed burning prescriptions.

In areas treated with regeneration harvest; site preparation for regeneration and fuel abatement, and regeneration will be established within five years of harvest completion. All regeneration areas would be regenerated with site-adapted species/seed source. To reduce shrub competition and fuels so that desired regeneration can be established, treatment areas would be prescribed burned.

#### **Features Designed to Protect TES Plants**

Known Sensitive plant occurrences in the Blue Alder Resource Area will be buffered from harvest and other project-related activities by a minimum of 100 feet (there are no known occurrences of Threatened or Endangered plants in the Blue Alder Resource Area). Prescribed fire **ignition** would not occur within riparian habitats, although fire would be allowed to back down **into** riparian areas. Higher fuel moistures in riparian habitats during prescribed burning conditions would likely limit the spread of any prescribed fire. To limit ground disturbance, fire line would be minimized in riparian areas, to those occasions when fire line is needed to contain the burn. However, fuelbreaks would be used in riparian areas such that the total amount of fire line may be minimized while still allowing safe and efficient implementation of prescribed burning. Should rare plants be located during implementation, one or more of the following protective measures would be implemented: 1) drop the proposed unit from activity; 2) modify the proposed unit or activity, 3) implement a minimum 150 -foot slope distance buffer, and/or 4) implement Timber Sale Contract provisions for Protection of Endangered Species, and Settlement for Environmental Cancellation.

#### **Features Designed to Reduce the Spread of Noxious Weeds**

Noxious weed prevention strategies on the Coeur d'Alene River Ranger District are conducted based on the Noxious Weeds Final Environmental Impact Statement and Record of Decision (USDA Forest Service, 2000; PF Doc. CR-028 and CR-029). Measures to protect Threatened, Endangered and Sensitive plant population viability and habitat capability during noxious weed treatment will be implemented following guidelines provided in that document. All roads used for implementation of harvest activities would be treated for noxious weeds, both prior to and after project completion. To help reduce the spread of noxious weeds and prevent the introduction of new invader species, a contract clause related to equipment washing would be used in all construction and timber sale contracts.

#### **Features Designed to Protect Soils**

To reduce the impacts to soils and soil productivity, the alternatives utilize Soil and Conservation Practices as described in the Soil and Water Conservation Practices (SWCP) Handbook (FSH 2509.22) (PF Doc. SOILS-R-72) and APPENDIX A. This handbook and appendix outlines Best Management Practices (BMPs) that protect the soil resources at a higher level than do existing Idaho Forest Practices rules and regulations, thereby incorporating all Idaho state standards. Following is a list of features that will be incorporated into the timber sale contract to protect soils to minimize soil disturbance:

**Soil productivity and nutrient cycling.** Fine organic matter and large woody debris would be retained on the ground for sustained nutrient recycling in harvest units, consistent with Graham et al (1994; PF Doc. SOIL-R-21).

- a) *Downed woody retention levels would be maintained at the lowest levels due to concern for fire hazard in the wildland urban interface. For the moist forest habitat types where harvest is to be implemented (Units C1, C3, C4, C8, C13, C15, C16, C21, C 24-28, C34, C40, C41, C43, C46 and C48) Graham et al (1994) recommend retaining 17 to 33 tons of downed woody material greater than three inches in diameter. In units where habitats are split between moist and dry (Units C12, C18, and C32), an average of 12 to 24 tons of downed woody debris should be left across both habitats. For the drier habitat types associated with all the remaining units with proposed harvest treatments, the recommended retention level is 7 to 15 tons (PF Doc. VEG-23).*
- b) *Slash left on the ground after harvest activities are complete and before fuel reduction activities start should be left to overwinter for nutrient recycling.*
- c) *The latest soil nutrient management recommendations from the Intermountain Forest Tree Nutrient Cooperative (IFTNC) and Rocky Mountain Research Station (RMRS) would be*

*applied as appropriate to each activity area where organic material is removed. Slash would be left to recycle nutrients back into the soil until site-prep occurs.*

- d) Only log-length yarding would be allowed in harvest units to further nutrient recycling (no whole-tree yarding). The leading end of logs would be suspended during skyline yarding. Yarding across any designated RHCA requires full suspension.*
- e) As this is a hazardous fuels reduction project within the wildland urban interface, determination of fire hazard where slash is left untreated for prolonged periods of time would be made by the district fire management officer. Where fire hazard is considered high, especially along shared boundaries with private property or heavily-used roads, flexibility would be given to treat slash prior to it being left for several months.*
- f) Prescribed burning and pile burning would occur only when the upper surface inch of mineral soil has a moisture content of 25% by weight, or when duff moisture exceeds 100%, or when other monitoring indicates soil productivity would be protected.*

**The following features would apply to tractor or forwarder units (Units C3, C 4, C8, C12, C13, C21, C27, C28, C32, C33, C40, C41, C43-47, C50, C52-57, and part of C7):**

- a) Ground-based yarding, processing, and harvester equipment would operate on slopes under 35% and utilize existing skid trails where possible.*
- b) All new skid trails would be agreed upon and designated on the ground by the purchaser and the Forest Service before felling begins.*
- c) Main skid trail spacing would average 100 feet or greater on ground skidded units, except where the trails converge at landings and as the terrain dictates otherwise.*
- d) Post-harvest, all utilized skid trails would be either covered with slash and randomly placed logs (on the contour) to increase the micro-topography needed to reduce runoff, stabilized with waterbars, or a combination of both.*
- e) Existing landings would be utilized where appropriate in order to maintain current soil compaction levels. All landings utilized would be covered with some residual slash (within guidelines provided by Graham et al. 1994 for coarse-woody debris by habitat type), and seeded upon completion of the sale.*
- f) All scheduling of harvest activities in tractor units would occur when the soil profile is dry to reduce the effects from compaction (Poff, 1996, p. 482; PF Doc. SOIL-R-47).*
- g) Any ground-based piling of slash would operate on slopes under 35%, would utilize existing skid trails where possible and operate on slash mats wherever possible.*
- h) In units where a forwarder would be used to remove log to the landing (Units C7, C8, C13, C21, and C44-47), slash mats would be use to reduce the potential and severity of compaction and displacement.*

### **Features Designed to Protect Aquatic Resources**

**Best Management Practices (BMPs):** All activities will be designed to protect water quality and aquatic resources through the use of BMPs, which are the primary mechanism to enable the achievement of water quality standards. Forest Service Handbook 2509.22 (Soil and Water Conservation Handbook) outlines BMPs that meet the intent of the water quality protection elements of the Idaho Forest Practices Act. Site-specific best management practices that have been specifically designed for the action alternatives and are part of the design criteria are described more fully in Appendix A. The estimated effectiveness of BMPs is considered moderate to high; depending on the practice. A description of each practice and an estimate of its effectiveness are located in Appendix A. Monitoring has evaluated the effectiveness of BMPs (USDA Forest Service Monitoring Reports 1995 – 2000; PF Doc. CR-004 through CR-016). These practices would be implemented since they are requirements tied to the timber sale contract. The Forest Service Timber Sale Administrator would frequently review the project for compliance with these and other timber sale requirements. The District aquatics staff would also do periodic monitoring to assess the effectiveness of these practices.

**Inland Native Fish Strategy (INFS):** In development of the proposed action, standards and guidelines of the INFS (pages A-6 through A-15; PF Doc. CR-003) were used specifically to protect water and aquatic biota within the Resource Area with application of streamside buffers. If Threatened or Endangered fish species are located during project implementation, protective measures would be implemented in compliance with the Inland Native Fish Strategy, including implementation of Timber Sale Contract provisions for Protection of Endangered Species, and Settlement for Environmental Cancellation.

**Protection of Wetlands, Seeps, Bogs, Wallows and Springs:** All known or discovered wetlands, seeps, bogs, elk wallows and springs less than one acre in size would be protected from timber harvest or road construction with an appropriate buffer for the species as prescribed by the District Botanist and Wildlife Biologist.

**Features Designed to Protect Wildlife Habitat**

To ensure that habitat still provides for the needs of flammulated owl and pygmy nuthatches when the project is completed, the following features will be included:

- ♦ *Where suitable habitat falls within harvest units, Forest Service personnel would complete the marking.*
- ♦ *A minimum of 35% canopy or a minimum basal area of 34ft<sup>2</sup> will be retained in flammulated owl habitat.*
- ♦ *Where available, small pockets of young/sapling Douglas-fir would be retained for post fledgling habitat.*

Snags would be retained to meet the Northern Region Snag Management Protocol (PF Doc. VEG-20 and VEG-21). Healthy western white pine, ponderosa pine and western larch of all sizes would be favored to retain on the site unless removal is unavoidable due to safety reasons or special circumstances. All roads closed to the public that are opened, constructed or reconstructed for the project would be closed with a gate or barrier during project activities. All of these roads would be effectively closed following project activities. At the end of project activities, all closure devices would be replaced in as good as or better condition than currently exists. Temporary roads would be recontoured following harvest activities. Incidental trees charred during prescribed burning operations would be retained on site to provide black-backed woodpecker habitat unless removal is unavoidable.

If a contractor elects to conduct winter logging, one half of the area must be inactive while activities occur in the other half from Dec. 1 through March 31 to protect big game winter range.

**Features Designed to Protect Cultural Resources**

All known cultural resource sites, eligible or potentially eligible to the National Register of Historic Places, will be protected or mitigated as directed by the National Historic Preservation Act.

Any future discovery of cultural resources sites or caves would be inventoried and protected if found to be of cultural significance. Timber Sale Contract provision #C6.24 *Protection of Cultural Resources* would be included in all timber sale contracts to ensure protection of the sites. A discovery plan for the protection of cultural resources would be included in timber sale contracts in case of cultural resource discovery during project implementation.

Culturally modified trees that are located in units proposed for activity would be protected from damage or adverse effects. Protection will include eliminating fuels around those trees in burn units, and marking them for retention in harvest units.

**2.5 Mitigation Measures**

After analyzing the potential effects of proposed activities, the following specific mitigation measures are needed to reduce impacts to soils.

Protecting soil quality under forest management is important for long-term productivity. All soils issues revolve around meeting Regional soil quality standards (USDA Forest Service, 1999) and Forest Plan Soil Quality Standards (USDA Forest Service, 1987). These specify a maximum 15% (Regional Standard) and 20% (Forest Plan Standard) allowable detrimental disturbance for all treatment units having ground-disturbing activities. Currently, four activity areas (C28, C44, C50 and C56) exceed both the Regional and Forest Plan Standards for detrimental disturbance based on activities conducted prior to the establishment of the standards. Also, two activity areas (C40 and C53) are below both standards with the likelihood to exceed with implementation of the harvest activity due to the location of existing skid trails. Post-harvest activities will include restoration to improve soil conditions to aid in recovery. Restoration will include decompaction of lateral skid trails to the main skid trail on the ridges. The soil profile along these lateral trails is generally deeper with a decrease in rock content and will respond better than

trails on top of the ridge which are shallow and skeletal. The one exception is activity area 40, where the soils along the ridge are deeper than and not as skeletal as the other activity areas. Restoration here would also serve to close the area to the illegal off-road traffic that have been using the area for recreation and fuel wood gathering. After completion of the mitigation, units C40 and C53 will meet Regional and Forest Plan Standards.

- a) *Decompaction should be conducted with as little mixing of the soil profiles as possible, keeping the most productive soils near the top.*
- b) *Seeding with native vegetation to reduce soil erosion.*
- c) *All treated skid trails will be covered with slash and randomly placed logs (within guidelines provided by Graham et al. 1994 for coarse-woody debris by habitat type).*
- d) *Main ridge skid trails not decompacted due to shallow and rocky conditions will be covered with slash (within guidelines provided by Graham et al. 1994 for coarse-woody debris by habitat type) and seeded with native grasses.*
- e) *Weed mitigation measures and prevention practices would occur in accordance with the requirement of the CDA Noxious Weed Management EIS (PF Doc. CR-28) for all landings, helicopter pads, and road disturbances.*

## **2.6 Implementation and Effects Monitoring**

There are no specific monitoring requirements identified for this project; however, the Forest Plan documents a system to monitor and evaluate Forest activities related to timber, visual resources, recreation, cultural resources, wildlife, water/fish, Threatened and Endangered species, minerals, lands and environmental quality (Forest Plan, Chapter IV, pages IV-10 through IV-12; PF Doc. CR-002). For example, sale administrators and other contracting representatives will monitor all timber sales to ensure that activities are conducted in accordance with contract specifications (that activities occur where and when they should to protect resources such as soils and wildlife, that yarding is accomplished as planned and specified in the contract to protect soils, that seedlings are planted at the appropriate spacing, etc.). Reforestation success in regeneration areas will be monitored until the District silviculturist certifies that they meet prescription requirements.

BMPs will be incorporated into many different phases of the project. The district hydrologist and engineering representative will review the location of all proposed temporary roads and all road maintenance to assure compliance with BMPs, and will monitor all temporary and reconstructed roads to ensure that they were built or restored to specifications. A sale administrator will visit each active cutting unit at a frequency necessary to assure compliance with the BMPs and the timber sale contract. Minor contract changes or contract modifications would be agreed upon and enacted, when necessary, to meet objectives and standards on the ground. Monitoring of BMPs has determined that recent projects on the IPNF have been implemented as designed and have achieved the desired objectives (IPNF Monitoring Reports for 2004 [pp. 37-44, 60; PF Doc. CR-026], 2003 [pp. 41-46, 76-77; PF Doc. CR-022], 2001 [pp.27-40; PF Doc. CR-017], and 2000 [pp. 34-41, PF Doc. CR-016]).

In addition, the collaborative group has shown an interest in and has applied for a National Forest Foundation grant to establish a multi-party monitoring program for this project. To the extent budget and manpower allows, the Forest Service will cooperate with this effort (HFRA Sec 102(g)(5)).

Based on these conditions, monitoring will be consistent with requirements of the HFRA (PL 108-148, Section 102[g]); PF Doc. CR-024).

## **2.7 Rationale for Selected Alternative**

My decision to select Alternative 3 weighed many factors, including the capability to address the purpose and need, the effect on other resource values, and the thoughtful public collaboration and comments on the project. Although our past projects had strong merit in natural resource management, some did not have support and were frequently appealed or litigated. Given the urgency of our land management mandates under the Healthy Forest Restoration Act (HFRA) and Healthy Forest Initiative, upfront and continuous involvement of interested and affected publics offered the possibility of reducing the divisiveness and delays of appeals and litigation.

HFRA was enacted to expedite treatment of hazardous fuels and reduce risks to communities from wildfires. HFRA also recognized the importance of collaboration, encouraging local involvement. It directed agencies like the Forest Service to work with local communities in developing community fire mitigation plans. The Kootenai County Local Emergency Planning Committee, an interagency group, developed the Kootenai County Wildland Urban Interface Fire Mitigation Plan. The Plan was adopted by the Kootenai County Commissioners. It mapped an area

referred to as the wildland urban interface (WUI). The WUI is the area within or adjacent to an at-risk community identified in a Community Wildfire Protection Plan. The Blue Alder Resource Area lies completely within the delineated WUI. The County Fire Mitigation Plan was just the beginning of the collaborative effort.

I applaud the Coeur d'Alene Chamber of Commerce and the commitment of those who came to the table under the umbrella of the Coeur d'Alene Forest Coalition to engage us, to learn from one another, and to walk a step in each others shoes (EA - Appendix G and DN - Sec 1.3). They were willing to reach beyond traditional positions and find shared interests. I know our frequent interaction with the Coalition strengthened relationships and proved educational for us. I hope our open process and information exchange provided similar benefits to those who participated. This initial venture into collaboration not only benefited the Blue Alder Resource Area, but is building trust for future collaborative efforts. It is a great example of how we are moving away from the contentious environment of the past.

We have invested over two years in public collaboration specific to the Blue Alder Resource Area. The information and ideas exchanged through the collaborative public forums and other public comment proved invaluable in developing a project that responded to various interests. I reflected on them at length as I deliberated between Alternatives, and considered the analyses documented in the EA and project file. I believe Alternative 3 best conveys the spirit of our collaborative journey. It reflects common interest in addressing wildland fire mitigation concerns and other vegetation management needs in the wildland urban interface (WUI); it moves us toward the desired condition. It seeks to balance the risks associated with divergent views on roads, acres treated, and treatment prescriptions. Let me compare it with the other alternatives further highlighting my rationale.

Alternative 1, the No Action Alternative, would not propose any management response to the stated purpose and need statements for the Blue Alder Resource Area. I did not select this Alternative because:

- ♦ *It does not respond to the recommendations of the County Fire Mitigation Plan to reduce wildfire risks within the WUI. The Blue Alder Resource Area falls within the WUI as defined by the plan. The area lays just east of Coeur d'Alene, a community at risk, according to the Federal Register listing of August 17, 2001. There are nearly 200 structures within a mile of the Resource Area, and significant private lands and values in the same area.*
- ♦ *There is an increasing risk of wildfire threat to national forest resource values from human ignition as development and use on adjacent private lands increases (debris burning, fireworks, etc.). Trending the area toward a patchwork of age classes and a more resilient mix of tree species will alter fire behavior and reduce catastrophic fire risks to water quality, wildlife habitat and aesthetic values.*
- ♦ *It does not pro-actively address the need to trend the area toward a species mix that is more resilient and less susceptible to endemic change agents in the area such as root disease.*
- ♦ *The action alternatives can be implemented to address the stated purpose and need for the Blue Alder Resource Area with either beneficial effects or negligible to no adverse effects to other resource values.*
- ♦ *After extensive dialogue in meetings and field trips, there was a general accord amongst participants in the collaborative forums for some degree of management action in response to the stated purpose and need.*

Alternative 2 (the Proposed Action) and Alternative 3 both propose management actions in response to the stated purpose and need statements for the Blue Alder Resource Area similar to Alternative 3 (Section 3.1 and EA Chapter 3). They are an outcome of lengthy collaborative deliberations, public comment and agency analysis. The actions are consistent with management direction for the area, including that contained in the Forest Plan and the County Fire Mitigation Plan. As noted above, both alternatives can be implemented with either beneficial effects or negligible to no adverse effects to other resource values (Section 3.2 and EA Chapter 3). The primary difference between them is the amount of proposed road construction and the number of treatment acres accessed by them.

There are a couple of other considerations worth noting. First, both action alternatives utilize an innovative silvicultural prescription concept developed through collaboration as described in Sections 1.3 and 2.3 and the EA at 3-59. It is designed to trend the area's species mix toward a more resilient species mix while reducing visual effects and concerns with canopy removal relative to water yield and peak flow concerns. It creates a mosaic of small openings and partial retention areas intended to trend species composition toward a more resilient mix, while integrating full retention or no harvest areas to break up harvest continuity. While it is a departure from more

customary and proven regeneration techniques for early seral species, we believe it has a good probability for success. We will monitor its implementation and effectiveness over time and ascertain its application beyond this project.

Speaking of monitoring, I am excited about the Coeur d'Alene Forest Coalition's interest in multi-party monitoring during implementation of the project. We are already involved in various monitoring efforts in the Resource Area and look forward to cooperating with interested parties and other agencies in this endeavor.

As noted in Section 1.6, one objection to the project was received after we released the environmental assessment for public review. Several comments from the objection were addressed during an informal disposition meeting with representatives to the objection. One of the focal concerns was effects of the action alternatives to water quality and water yield (peak flows). An in-depth discussion of the analysis and tools used to assess these effects is provided in EA – Chapter 3, summarized in this decision in Section 3.2, and supported with record in the project file. In short, no potential exists for measurable increases in sediment, water yield and peak flow or delay of watershed recovery under either action alternative. Reviewing Officer Kathy McAllister (USDA Forest Service, Northern Region) considered the Blue Alder Resource Area project and objection in its entirety and found the project wholly compliant with applicable laws and regulations, particularly as they relate to HFRA.

My decision between Alternative 2 and Alternative 3 came down to balancing the risks associated with their differences and consideration of the values and greater good associated with collaboration. The primary issue was the construction of new permanent road segments. As noted earlier in Section 1.3, some who commented in writing or through the collaborative forum were uncomfortable with the construction of additional permanent road segments (3.2 miles) required to access treatment areas in Alternative 2. They identified potential concerns with the routes and found them contrary to their values for the area. I know the sensitivity of this issue is elevated by the legacy road network on the Coeur d'Alene River Ranger District. I must consider those perceived risks and values against the risk of not treating 243 planned treatment acres accessed by those roads. Over two thirds of those acres (170) are within ½ mile of private lands and structures. Section 3.1 provides a summary of the risks of not treating these acres, particularly in the Marie Creek drainage.

I appreciated the exhaustive collaborative discussions on this topic, field reviews of the proposed road locations and treatment areas, and the Coalition's independent review of our road management strategy. I also reviewed the effects analysis in Chapter 3 of the EA relative to these two proposed road segments and the proposed decommissioning of 22 miles of existing road. I do not find that the proposed road segments pose a substantive risk to the area's resource values, but I respect the issue they raise with certain personal values.

I selected Alternative 3 over Alternative 2 primarily because it removes the contentiousness of the road issue while sufficiently addressing the stated purpose and need for the project. There is a depth of risk in not treating the units in Marie Creek. I am accepting that risk in consideration of the lengthy deliberations and the desire to not let this issue impede the collaborative support for the focal aspects of this project. Alternative 3 will still treat by mechanical means and/or burning 93% of the area proposed under Alternative 2. In addition to reducing hazardous fuels and improving forest health and wildlife habitat, it proposes measures to further benefit affected watersheds by closing unauthorized motorized routes and decommissioning 22 miles of road.

The subject of roads will be on the table again and will need to be discussed case by case. Roads are a necessary part of cost effective land management. We will continue to analyze the existing road system looking for opportunities to improve, relocate, decommission and in some cases supplement where appropriate to meet long term land and resource management needs.

### 3. Comparison to Other Alternatives

#### 3.1 Comparison of Effectiveness in Meeting the Purpose and Need

##### Reduce hazardous fuels in the Wildland Urban Interface

Alternative 1 would not address the purpose and need to reduce fuels in any way. It would not reduce surface, ladder or crown fuels. Alternative 1 would allow the continued threat of uncontrolled wildland fire to exist with no proactive management to protect forest resources and wildland-urban interface values. Site-specific fuel inventories have established that very high fuel loadings exist in the resource area (PF Doc. FF-43). These fuel loadings would contribute to extreme fire behavior under certain weather conditions, and will make fires difficult to control even under moderate conditions.

Alternative 2 would provide the most fuel reduction and the most protection in the face of fire seasons that have already been proven to be longer, resulting in an increased incidence of large wildfires (Westerling et al. 2006, PF Doc FF-89). The Minimum Travel Time analysis of Alternative 2 has shown that the vegetation treatments significantly slow the rate of spread of uncontrolled fires, allowing more time for the safe evacuation of residents, as well as more time for effective fire suppression before fires reach the urban interface. Alternative 2 includes key units in Marie Creek, which would provide an impediment to fire spread down Marie Creek and to the homes in Wolf Lodge. Given the likelihood of ignitions near Skitwish Ridge (PF Doc. FF-54), the probability of easterly winds (Figure 3-FF-8), and the inaccessibility of the Skitwish Ridge Roadless Area, it is an obvious possibility that uncontrolled fire in Marie Creek could threaten homes in Wolf Lodge.

The exclusion of these units in Alternative 3 could come at a cost, if this possibility is ever realized. With that exception, Alternative 3 is highly similar in terms of fuel reduction and improvement in Fire Regime Condition Class to Alternative 2. Treating the fuelbreak along Marie Creek ridge as well as completing the prescribed burn on this same ridge would provide some break in the fuel continuity in this area.

##### Establish and maintain long-lived early seral species and resilient structure

Resilience is the amount of change that a system can absorb before it undergoes a major shift in composition, structure, or processes (EA, p. 3-40). Effectiveness of the alternatives in addressing forest composition objectives is indicated by the percent forest cover type (specifically, Douglas-fir and grand fir are compared to the long-lived early seral species – ponderosa pine, western larch, and white pine). Effectiveness in addressing forest structure objectives is indicated by size class, vertical structure, and patch sizes. The vegetative analysis also addressed old growth.

**Alternative 1 (No Action)** would not be at all effective in meeting this need, because there would be no activities to restore forest health toward increased resiliency (EA, p. 3-55). Over the long term, the limited component of western larch and white pine now present would continue to decline, while grand fir and hemlock would become increasingly dominant components in the resource area.

**Alternatives 2 and 3** would both be responsive to this need, resulting in a trend toward the desired condition, which represents more resilient vegetative conditions (EA, p. 3-63). Alternative 2 would be slightly more effective than Alternative 3, due to the difference in proposed treatments (EA, p. 2-5, Table 2-0). The white pine/western larch/ponderosa pine cover type would increase from 13.7 percent to 25.7 percent under Alternative 3, and to 27.5 percent under Alternative 2 (EA, p. 3-66, Table 3-VEG-14). The treatment units, in conjunction with previously-regenerated areas, would create openings on the landscape of the scale and pattern that are similar to the desired conditions and historic disturbance regimes for this resource area (EA, p. 3-72).

##### Maintain and improve dry-site wildlife (flamulated owl and pygmy nuthatch) habitat and big-game habitat

Flamulated owls and pygmy nuthatches both inhabit the same open, old ponderosa pine stands and rely on large-diameter ponderosa pine for foraging and nesting (EA, p. 3-187). Both species have a high probability of occurrence in the resource area.

**Alternative 1 (No Action)** would not be effective in improving or even maintaining habitat for dry-site wildlife and big game. There would be no short-term change, because no activities would occur (EA, p. 3-189). Stands within the resource area would maintain their suitability for flamulated owl and pygmy nuthatch habitat for the next 50 years. Over the long term, reductions in the seed source and competition from Douglas-fir and grand-fir would result in a low potential for dry-site stands in the resource area to trend toward the ponderosa pine habitat preferred by flamulated owls and pygmy nuthatches (EA, p. 3-189, 3-190).

No short-term effects would occur to big-game habitat under Alternative 1 (EA, p. 3-222). Foraging habitat may decline over time as fire suppression continues and the brush component continues to become more decadent. A small amount of wildlife burning associated with the past Horizon Sun project will improve forage in Marie Creek drainage. Canopy closure, which can provide big game with thermal and hiding cover, will decline over the long term. Security would not change because no existing roads would be re-opened and no new roads would be constructed. However, illegal ATV routes would not be closed under this project, and would not be closed until other funds become available (EA, p. 3-222).

**Alternatives 2 and 3** were both designed to avoid activities in flammulated owl and pygmy nuthatch habitat where feasible (EA, p. 3-190). Currently there are 990 acres of habitat for these species in the resource area (EA, p. 3-189). Approximately 219 acres of habitat for these species falls within variable retention harvest units under Alternative 2, with 203 acres in variable retention units under Alternative 3 (EA, p. 3-191, Table 3-WL-4). Where harvest does occur in habitat for these species, specific design features (EA, p. 2-8) will be implemented to ensure that habitat still provides for the needs of these species when the project is completed (EA, p. 3-190).

Burning will be implemented on 110 acres of habitat for these species to help maintain open stands of ponderosa pine (flammulated owl and pygmy nuthatch habitat) over time (EA, p. 3-190). Outside of habitat delineated for these species, an additional 1,060 acres of prescribed burning would benefit flammulated owl and pygmy nuthatch habitat by increasing snag availability and by increasing or maintaining the open understory found in preferred habitat. Prescribed burning could impact individual nesting birds that were not located during surveys if the nest tree were burned. Over the long term, current mature and immature stands would increase in age and diameter providing additional habitat for these species.

The few acres of wildlife brush field burning that lies within delineated habitat for the flammulated owl and pygmy nuthatch (EA, p. 3-190) is due to logical topographic boundaries and would have no effect upon the nesting habitat for these species. Rehabilitation on 89 acres of habitat for these species will occur only in areas that are rapidly deteriorating. These areas are primarily brush fields within larger blocks of habitat for the species. The implementation of this work would have little impact to the flammulated owl or pygmy nuthatch in the short term. Over the long term these areas will provide preferred ponderosa pine habitat (EA, p. 3-190).

In all activity areas wherever possible, large-diameter trees, including Douglas-fir, will be retained singly and in groups (EA, p. 3-190). Where ponderosa pine occurs in the overstory it will be favored for retention. Dry site habitats will be managed to promote ponderosa pine for the long term.

Activities may cause some disturbance to elk, but would trend toward more resilient stands. Prescribed fire activities would also result in improved forage conditions for big game. Elk security areas (as defined by the elk habitat model) would be reduced slightly (from 1 to 2 percent in all areas except Compartment 366 which would decrease by 10%) during activities (EA, p. 3-223, Table 3-WL-10). Security would return to current levels once activities are completed (EA, p. 3-223, Table 3-WL-12).

## **3.2 Comparison of Effects to Other Resources**

The purpose and need focused on fire/fuel and forest vegetative conditions as well as dry site and big game wildlife habitat. The following compares the effects of the Alternatives on other resources.

### **Effects to Rare Plants**

**Indicators of Impacts:** Analysis was conducted using sensitive plant surveys, current distribution and condition of sensitive plant species in habitats similar to those found in the proposed treatment sites, types of proposed treatments and the likely effects to existing populations and habitat from the proposed activity based on current knowledge and professional judgment (EA p. 3-236).

**Alternative 1 (No Action),** would have no direct impact on any Threatened and Endangered species, Sensitive plants, or Forest Species of Concern (EA, p. 3-242). While there would be no direct impacts to these species with this alternative, there would also be no improvement made to vegetative and watershed conditions, which could in the long term provide potentially suitable sensitive plant habitat. Forest Plan standards and legal mandates would be met. However, indirect effects to Threatened, Sensitive, and FSOC plant habitat and populations are likely for certain guilds and species (there are no Endangered plants identified for the Idaho Panhandle National Forests). Indirectly, there would be an increased risk to sensitive plants and habitat due to the gradual increase in fuel loads through time, and with continuing fire suppression. The greater the fuel loading, the greater the risk of a high intensity burn and stand replacing fire, with possible loss of rare plants and habitat. The effects to rare plants resulting from a wildfire could range from beneficial to intolerant, depending on factors like the severity of the fire, the species ability to survive the event, and compete in early successional habitat (EA p. 3-243).

Over the short term, timber harvest activities under **Alternatives 2 and 3** would affect potential rare plant habitat in the dry forest and moist forest guilds, while prescribed burning activities would affect primarily dry forest habitat (EA, p. 3-242). Alternative 2 would affect 14 percent of rare plant guild acres in the resource area; Alternative 3 would affect 13 percent. Activities may impact sensitive plant individuals or habitat in the dry and moist forest guilds, but implementation features (including plant surveys and other protective measures described in the EA, p. 2-6) will prevent a trend toward federal listing or a loss of species or viability (EA, p. 3-248, Table 3-TES-7). Activities will have no impact on other rare plant guilds.

### **Effects to Noxious Weeds**

**Indicators of Impacts:** Fifty-seven percent of forest cover types in the Blue Alder Resource Area are in the weed-susceptible Douglas-fir and ponderosa pine types (EA, p. 3-253). Spotted knapweed, yellow and Dalmatian toadflax, bull thistle and Canada thistle are currently infesting many sites in the Resource Area. Analysis of effects to noxious weeds was conducted using results of past noxious weed surveys, the types of proposed treatments, and the risk of weed spread and introduction of new weed invaders from the proposed activities, based on current knowledge and professional judgment (EA, p. 3-252).

**Under Alternative 1 (No Action),** there would be no direct effects to noxious weeds, because no ground-disturbing activities would be implemented (EA, p. 3-254). Indirectly, there would be a natural reduction in forest canopy cover due to forest insect and disease-related mortality. Canopy loss and the subsequent increased sunlight in these stands would increase susceptibility of the dry Douglas-fir and ponderosa pine/larch cover types to invasion by such common weed species as St. Johnswort, thistles, toadflax, and spotted knapweed. Where these species are already established in affected areas, they would likely increase. In habitats with a developed shrub layer, the shrub cover would increase, limiting the risk of weed encroachment.

As part of the Coeur d'Alene River Ranger District's annual weed treatment program, noxious weeds would be monitored and treated as necessary along Forest Roads 202 and 413, and along Trail 241 (EA, p. 3-254).

Because Alternative 1 would not block unauthorized off-road vehicle travel, weeds would likely continue to increase in areas where these illegal routes exist (EA, p. 3-254). The lack of fuels treatment would, over time, increase the risk of high severity fire. High-severity burned areas would have more exposed mineral soil which is susceptible to weed invasion (EA, p. 3-254).

**Under Alternatives 2 and 3,** areas of soil disturbance in susceptible habitats would be at risk for weed invasion, particularly where ground-disturbing activities occur near existing infestations (EA, p. 3-254). Alternative 2 would have slightly more timber harvest than Alternative 3, and would include system road construction; therefore effects would be slightly more under Alternative 2 than Alternative 3 (EA, p. 3-255). Measures to reduce the spread of noxious weeds would be implemented following the guidelines of the Noxious Weeds Final Environmental Impact Statement and Record of Decision (EA, p. 2-6).

The Forest Service does not have control over activities occurring on private lands; weed introduction and spread is likely occurring. The District is working on an ongoing basis with the State of Idaho, county officials, and members of the public to control noxious weeds within the Inland Empire Cooperative Weed Management Area, which includes the Blue Alder Resource Area (EA, p. 3-256). Post-activity monitoring for weeds and weed treatment will occur as funds are available (EA, p. 2-10).

### **Effects to Aquatics**

**Indicators of Impacts:** The main concerns related to aquatic resources are effects to water quality, stream channels, and fish habitat caused by increased sediment yield, water yield, and/or peak flow (EA, p. 3-84). Environmental consequences to these resources were measured through changes in the magnitude, intensity or duration of sediment yield, water yield, and peak flows (EA, pages 3-85 through 3-87). The primary tool for assessing effects to these indicators from forest practices is WATSED, a model which has been calibrated specifically to the Idaho Panhandle National Forests (IPNF) and frequently validated using long-term water quality monitoring networks on the IPNF (EA, page 3-88).

**Under Alternative 1 (No Action),** no activities would be implemented, therefore there would be no direct or indirect effects to aquatic resources (EA, p. 3-126).

There would be cumulative effects associated with activities on private land in the Blue Creek and Lower Wolf Lodge watersheds, and road maintenance along Interstate 90 in the Cedar Creek. Private land accounts for 34 percent of the watershed cumulative effects analysis area (EA, p. 3-82, PF Doc. AQ-05), with the majority of the private land in the Blue Creek watershed (70% of the watershed) and Lower Wolf Lodge watershed (85% of the

watershed) (EA, p. 3-93, Table 3-AQ-2). Private lands are in the lower portions of these subwatersheds, with residences and developed acreage (i.e., agricultural lands) generally along or associated with the riparian area (PF Doc. AQ-27). Upslope areas are under private or corporate timber management, and some are also being grazed. Some of the private roads accessing homes have delivered sediment to area streams from road fill failures, road surface runoff, and immediate riparian activities. Sediment delivery levels from these private roads are based on the level of road maintenance activities. It is reasonable to suspect that private land development will continue to occur, specifically timber harvest activities to clear more acreage for land use change (i.e. home development). Stream bank stabilization and dike construction activities have altered channel morphology and floodplain function, especially within Lower Blue Creek and Wolf Lodge Creek. This most likely has increased sediment delivery for stream banks and reduced fish habitat. Highway maintenance (I-90), including sanding and ice and snow control, will continue to contribute excessive levels of sediment (sand size) to Cedar Creek.

**Under the action alternatives**, sediment yield is variable by subwatershed as modeled by WATSED. **For Alternative 2**, modeled sediment yield increases attributed to proposed activities on National Forest land would range from 1 to 7 percent in modeled watersheds (EA, p. 3-130, Table 3-AQ-12, and Attachment B – Decision Notice Errata and Changed Conditions for revised sediment yield in Blue Creek.) **For Alternative 3**, modeled sediment yield increases attributed to proposed activities on National Forest land would range from 0 to 5 percent in modeled watersheds (EA, p. 3-130, Table 3-AQ-12, and Attachment B – Decision Notice Errata and Changed Conditions for sediment yield in Blue Creek.) The modeled sediment increases are a function of stream crossings where reconstruction will occur. These are short term increases estimated to last three years before returning to baseline conditions and are not measurable in the downstream reaches. Over the long term, improved drainage features would reduce risk of catastrophic failure of the road crossing and potential large pulses of sediment that could be delivered to the stream system. (EA, p.3-131)

According to the guidelines for WATSED, changes in sediment yield from 0 to 10 percent mean that “No potential exists for measurable increases in sediment or delay of watershed recovery. For example, if you dumped a cup of dirt into a stream, you know the sediment has increased; yet it would not be measurable at a gauging station or with modern sediment sampling equipment.” (EA, p. 3-86)

The cumulative effects to sediment yield under Alternatives 2 and 3 would not be any greater than those associated with Alternative 1, the No Action alternative (EA, p. 3-137). In other words there is no additive effect since the sediment yield under Alternative 2 or 3 is immeasurable. The implementation of either action alternative would not further impair or delay the recovery of beneficial uses within Wolf Lodge Basin, and would meet the intent of the Coeur d’Alene Lake and River TMDL (EA, p. 3-137). Application of buffers as defined by the Inland Native Fish Strategy and the use of vented rock crossings on opened roads would further mitigate increases of sediment and reduce risks of road crossing failures.

By using timing restrictions, onsite direction, and BMP’s, sediment delivery to occupied fish habitat associated with culvert replacement, upgrades and new construction would be minimized, and there would be no direct or indirect effects to fish habitat.

**Under either Alternative 2 or Alternative 3**, there would be no measurable increases in water yield or peak flow, or delay of watershed recovery (EA, p. 3-129, Table 3-AQ-11). Modeled increases in water yield would range from 0 to 3 percent in the modeled watersheds for both alternatives, and 0 to 4 percent in peak flows for both alternatives. According to the guidelines for WATSED, changes in water yield or peak flow from 0 to 5 percent mean that “No potential exists for measurable increases in water yield and peak flow or delay of watershed recovery.” (EA, p. 3-86) Consequently, there would be no direct or indirect effects to fish habitat or populations based on water yield interpretation, because these modeled increases are within the historic range of variability for magnitude, intensity, and duration. Salmonid redds, aquatic life, and their associated habitat existing in the cumulative effects area would not be directly or indirectly affected by implementation of either alternative (EA, p. 3-129).

Under Alternatives 2 and 3, cumulative effects from sediment yield, water yield and peak flow to stream channel morphology and fisheries would be no different than under the No-Action Alternative (EA, p. 3-138).

## Effects to Soils

**Indicators of Impacts:** The IPNF Soil NEPA Analysis Process (Niehoff 2002; PF Doc. SOIL-R44) was used to determine whether proposed activities would detrimentally impact or have cumulative effects on soils (EA, p. 3-156). Direct effects were measured by analyzing the effects of compaction, erosion, severe burning, rutting, or displacement on the soil surface which is the most productive layer and also the easiest to disturb (EA, p. 3-156). Compaction, displacement and severe burning can affect the soil's physical, chemical and biological properties, which can indirectly affect the growth and health of trees and other plants. Compaction reduces soil permeability and infiltration, which can cause soil erosion. Displacement reduces plant growth where topsoil and organic matter are removed. Severely burned soils can become water repellent, leading to increased erosion and runoff, and/or reduced productivity. Acres of detrimental disturbance were calculated by multiplying the areas of activity disturbance by the disturbance coefficient derived from monitoring reports (EA, p. 3-157). Indirect effects to soils include the loss of site productivity due to the removal of large woody debris and nutrients (EA, p. 3-157). Large woody debris is essential for maintenance of sufficient microorganism populations and long-term site productivity.

**Under Alternative 1 (No Action),** there would be no direct impacts to soils because no new road construction, logging or fuel treatment activities would occur (EA, p. 3-159). Stands currently at high risk for mortality would not be treated, which may increase the risk of stand loss due to wildfire, severe burning, and loss of soil nutrients. The introduction of weeds and unwanted flora following a fire could lead to higher competition between less desirable and native vegetation. In the absence of such a hot fire, nutrients would be retained on site. However, stand conversion back to more site-appropriate tree species would be delayed in comparison to either of the action alternatives.

**Under Alternatives 2 and 3** implementation of activities would result in an increase in detrimental soil disturbance such as compaction and displacement, particularly in harvest units where multiple activities such as road and landing construction, fuel treatments, and tractor logging would occur. Under either alternative, there are four activity units that currently do not meet either the Forest Plan or Regional standard for detrimental disturbance: Units 28, 44, 50 and 56 all have had previous harvest entries using tractor yarding that have caused enough detrimental disturbances to exceed Forest Plan and Regional soil standards (EA, p. 3-160; p. 3-162 through 3-165, Tables 3-SOIL-5 and 3-SOIL-6). There are two additional areas (Units 40 and 53) that currently meet both standards, but would exceed one or both of the standards without the selected mitigation. A combination of seasonal restrictions and strict adherence to use of existing skid trail corridors and slash mats whenever possible would provide protection so that effects are not increased beyond current conditions (EA, p. 3-166). In addition, net improvement on previously-impacted activity areas would be achieved through soil restoration activities targeting detrimental disturbance in all six of these units. This would be accomplished through decompaction, addition of organic material, seeding, and weed control. Anticipated results would be an improvement in hydrologic function and initiation of a recovery process that otherwise may be prolonged as soil compaction persists. Forest Plan monitoring, following harvesting activities, is scheduled to assess whether mitigation objectives in these units are met (EA, p. 3-166).

The remaining activity areas proposed for tractor yarding have varying degrees of disturbance associated with past harvest activities and roading, but would all meet both the Forest Plan and Regional soil standards (EA, p. 3-161). Minor disturbances would occur on helicopter and skyline units and where hand fireline is constructed around the perimeter of a unit. Past monitoring indicates these impacts result in virtually no detrimental conditions (EA, p. 3-160).

Both alternatives would maintain sufficient large woody debris to maintain site productivity, through the use of guidelines in Graham et al, 1994 (EA, p. 3-170; PF Doc SOIL-R21).

## Effects to Wildlife

**Indicators of Impacts:** Wildlife species listed under the Endangered Species Act, Sensitive species, and Management Indicator species known to occur on the Idaho Panhandle National Forests were screened for their relevancy to the Coeur d'Alene River Basin and the Blue Alder Resource Area by reviewing sighting records, planning documents, habitat suitability index (HSI) models and other sources such as historic records and scientific literature (EA, p. 3-179). Relevancy is determined based on whether there is evidence of species or habitat present within the analysis area, and whether any such species or habitat could potentially be affected by the proposed activities.

Some habitat and species may occur in the Coeur d'Alene River Basin yet not be applicable to the Blue Alder Resource Area or surrounding areas (EA, Appendix E). Some wildlife species or their habitat are present in the

analysis area but would not be measurably affected, either because they would not be impacted by proposed activities, the impacts would not be sufficient to influence their use or occurrence, or the species' needs can be adequately addressed through design of the project. No further discussion or analysis is necessary for those species and/or suitable habitat that are not found in the project area or for those which would not be measurably affected.

Gray wolves, which were analyzed and discussed as a Sensitive species in the Blue Alder EA, were placed back on the endangered species list after the Blue Alder EA had been released to the public. The Biological Assessment was prepared in accordance with Section 7(c) of ESA and Counterpart regulations; and manual direction to review all Forest Service activities to ensure that such activities do not contribute to a downward trend in population numbers or density of species and/or a downward trend in habitat capability (FSM 2672.1 and 2672.4).

The Counterpart regulations are an Alternative Consultation Agreement (ACA) that have been prepared pursuant to the Joint Counterpart Endangered Species Act (ESA) Section 7 Consultation Regulations issued on December 8, 2003 (Federal Register, pages 68254-68265), to support implementation of the ESA. The counterpart regulations complement the general consultation regulations at 50 CFR 402 by providing an alternative process for completing section 7 consultations for Federal Agency actions that authorize, fund, or carry out projects that support the National Fire Plan (NFP).

Other species analyzed in detail include flammulated owls, pygmy nuthatches, black-backed woodpeckers, fishers, wolverines, Coeur d'Alene salamanders, boreal toads, fringed myotis, pileated woodpeckers, northern goshawks, pine marten, and Rocky Mountain elk (EA, p. 3-180). Habitat for nongame species was also considered.

**Under Alternative 1 (No Action)**, there would be no direct effect to any species because no new activities would occur. Over the long term, changing conditions would benefit some species while impacting others. For example, over the long-term, natural mortality would result in more snags, benefiting snag-dependent species such as black-backed woodpecker and northern goshawks (EA, p. 3-194). However, quality late-successional habitat for fisher, pileated woodpeckers, and goshawks may not be maintained as a result of canopy closure loss over time due to Douglas-fir root disease, other diseases, and insects (EA, p. 3-199, 3-214). Competition with Douglas-fir and grand-fir would result in a low potential for dry-site stands in the resource area to trend toward the ponderosa pine habitat preferred by flammulated owls and pygmy nuthatches, as well as some nongame species (EA, p. 3-189, 3-190, 3-225). A continued decline in brush fields would result in less foraging habitat for deer and elk, and therefore lower prey populations for wolves (EA, pp. 3-186, 3-222).

The potential for a stand-replacing fire would be higher under Alternative 1 than under Alternatives 2 or 3 (EA, p. 3-189), posing long-term risks to stands. In the event of stand-replacing fires, forage habitat for some species would increase for about 5 years, after which the forage value would be greatly reduced.

Impacts due to illegal ATV routes would continue unless and until effective closure could be made with analysis and funding under another project (EA, p. 3-222).

Under **Alternatives 2 and 3**, there would be no significant impact to any of the species considered, and there would be no loss of viability to populations or species under either alternative (EA, pp. 3-187, 3-191, 3-195, 3-200, 3-203, 3-205, 3-206, 3-208, 3-211, 3-216, 3-219, and 3-224.) The long-term improvement in habitat and other benefits to wildlife species would outweigh the short-term disturbance to species during implementation of project activities. Activities may cause some disturbance but would result in larger trees and more resilient stands (EA, pp. 3-191, 3-200, 3-208, 3-211, 3-214, 3-216, 3-223).

## Effects to Recreation

**Indicators of Impacts:** There are no developed campgrounds, picnic areas, or other structural recreation developments in or near the Blue Alder Resource Area. The only recreation trail in the area is Marie Creek Trail 271. The analysis addressed impacts to Marie Creek Trail as a result of implementing proposed activities, and effective closure of unauthorized ATV trails (EA, p. 3-263).

Under **Alternative 1 (No Action)**, there would be no effect to Marie Creek Trail. Unauthorized ATV trails would not be closed under this project, causing continued impacts and damage to resources (EA, p. 264).

Under **Alternatives 2 and 3**, Marie Creek Trail would only briefly be affected by prescribed burning on some open slopes north of the trail. Installation of physical barriers would reduce illegal ATV trails in the area, reducing impacts and damage to resources (EA, p. 3-264).

## Effects to Roadless Areas

**Indicators of Impacts:** A portion of one inventoried roadless area is within the boundaries of the Blue Alder Resource Area: Skitwish Roadless Area (01135) encompasses much of the Marie Creek drainage, including part of Skitwish Creek. Attributes of the roadless area were considered: natural integrity, apparent naturalness, remoteness, solitude, special features, manageability/boundaries, and special places (EA, p. 3-265).

Under **Alternative 1 (No Action)**, there would be no effect to the natural integrity, apparent naturalness, and distinctive features of the inventoried roadless area (EA, p. 3-266).

Under **Alternatives 2 and 3**, prescribed burning is the only proposed activity that would occur in the Skitwish Roadless Area (EA, p. 3-266). Prescribed burning on approximately 60 acres (of a total of 80 acres proposed within the roadless area) would affect the area in the vicinity of Marie Creek Trail 271 from its trailhead to milepost 1. There would also be some burning in the headwaters of Rutherford Creek watershed. Both burns would be in brushy areas with thin timber cover. Prescribed fire is considered an action that mimics naturally-occurring events and is therefore consistent with roadless area management. Activities under either alternative would have no effect on the seven attributes of roadless character; visual effects would be temporary (EA, p. 3-266).

## Effects to Scenery

**Indicators of Impacts:** The Blue Alder Resource Area forms a background to the rural and moderately urbanized areas in the vicinity of Wolf Lodge, Blue Creek, and Alder Creek drainages (EA, p. 3-267). The foreground views when looking up into the area are highly affected by human construction and landscaping. The view is pleasing but not pristine. The analysis considered whether proposed activities would comply with Visual Quality Standards (EA, p. 3-267). In the Blue Alder Resource Area, of primary concern is the landscape that can be observed from viewpoints identified in the Forest Plan (EA, p. 3-268). Areas that can be seen from the identified viewpoints of high concern have a visual quality objective of *partial retention*. The Forest Plan objective for management activities in “partial retention” areas is that they remain visually subordinate to the characteristic landscape. Areas that cannot be observed from key viewpoints have a *modification* objective. The Forest Plan objective for management activities in “modification” areas is that they may visually dominate the characteristic landscape, but must attempt to borrow from naturally-occurring landform shape.

Under **Alternative 1 (No Action)**, there would be no immediate effects to scenery in the vicinity of the Blue Alder Resource Area, because no activities are proposed. Small changes such as insect and disease outbreaks would be noticeable over the short term from key viewing points. It would require a fairly significant event, such as a major wildfire, to have any drastic effects on the scenery (EA, p. 3-267).

Under **Alternatives 2 and 3**, commercial vegetative treatments visible from key viewpoints would occur in Rutherford Gulch, Cedar Creek, and Meyers Hill Road. Under Alternative 2 (but not 3), activities would also occur in the Marie Creek drainage (EA, p. 3-268). All of these units would conform to visual standards due to the use of variable retention harvest prescriptions, blending into adjacent areas, and keeping to the size of openings characteristic of the surrounding area. Distance from key viewpoints and irregular-shaped openings would also reduce the visual impact of these units.

Most prescribed burning units are not in sight of key viewpoints. Those that are in sight would meet visual quality standards, with only short-term, temporary effects (blackened ground, reddened trees, etc.). After a burned area greens up, the result is often an improvement in the visual quality condition of a site (EA, p. 3-268).

In total, the management activities under Alternatives 2 and 3 meet the Forest visual quality standards. When compared to the characteristic scenic condition of surrounding private lands, the effect of the proposed activities would be minimal (EA, p. 3-268).

## Effects to Old Growth

**Indicators of Impacts:** The Blue Alder Resource Area is within portions of three old growth management units (OGMU's 328, 329 and 330) (Table 3-VEG-4 at EA page 3-52). Indicators of impacts are disclosed through alternative effects to allocated old growth and compliance with Forest Plan Standards for Old Growth.

Under **Alternative 1 (No Action)**, no treatments will occur in allocated old growth. Alternative 1 complies will all Forest Plan Old Growth Standards (EA page 3-66 through 70). Root disease, decay and insects will continue to cause deterioration of stands (EA page 3-55); surface fuels would continue to accumulate (EA 3-17); forests would be less resilient to fire and would experience more pronounced fire effects and an increased amount of mortality associated with a wildfire (EA 3-17) and a greater possibility that severe wildfire would threaten environmental values (EA page 3-18).

Under **Alternatives 2 and 3**, prescribed burning (with no associated harvest) would occur in 4 areas (75 acres) of allocated old growth in OGMU's 328, 329 and 330; and a commercial thin from below would occur in 1 area (33 acres) of allocated old growth in OGMU 330. The 75 acres of allocated old growth proposed for prescribed burning (without harvest) represents dry Douglas-fir habitat types and the objective of the burning is to reduce fuel accumulations without loss of large trees. The proposed burning is not expected to change old growth allocation (EA page 3-58). The 33 acres of commercial thinning in allocated old growth is in a stand with dry habitat type areas (with very large, old ponderosa pine) in a mosaic with moist habitat types. The objective of the proposed harvest and fuels treatment is to maintain and improve resiliency of the old growth characteristics (EA 3-60). (Rectify with statement and rationale in Section 2.3) The treatment area is adjacent to private lands, structures, Interstate 90, a natural gas pipeline, and power lines. With this development comes the risk of human-caused fires in addition to natural ignitions, either of which threaten WUI and forest values (EA pgs. 3-2, 3-60, 3-68). The proposed harvest in allocated old growth would not change old growth allocation status (EA 3-61). Alternatives 2 and 3 comply with all Forest Plan Old Growth Standards (EA page 3-66 through 70). A through review of the OGMU's associated with the Blue Area Resource Area (28,709 acres) was conducted to locate areas of additional old growth that would meet Forest Plan old growth definitions and standards; none were found (EA page 3-41 and 3-52). This information as well as screening for old growth characteristics of all activity units is found in the project file (PF Docs. VEG-31, 32, 33, 34, 35, 36 and 37).

## **4. Findings and Consistency with Laws, Regulations and Policy**

### **4.1 NFMA Requirements for Forest Plan Consistency**

The National Forest Management Act (NFMA) requires that all projects must be consistent with the governing Forest Plan (16 USC 1604[i]). The EA (Chapter 3) addresses consistency of the alternatives with the 1987 Forest Plan standards and other legal requirements (EA, p. 3-1).

The Selected Alternative uses prescribed fire to help meet the goals of the management areas within the Blue Alder Resource Area, consistent with the Forest Plan (EA, p. 3-32, 3-33). It would help develop cost-effective fire programs by making substantial progress toward reducing potential intensities of wildfire in areas affected by past fire exclusion.

Forest Plan direction provides that timber management activities will be the primary process used to minimize the hazards of insects and diseases and will be accomplished by maintaining stand vigor and diversity of plant communities and tree species (EA, p. 3-66). Forest direction regarding vegetation is also guided by the Forest Plan standards for old growth, timber, forest protection, and individual management areas. Standards related to each of these would be fully met under the Selected Alternative (EA, pp. 3-66 through 3-75).

The Selected Alternative would meet the requirements of the Forest Plan for water resources and fisheries (EA, p. 3-139 through 3-141). Specific requirements and how the project meets them are listed in the EA, Appendix A (Best Management Practices) and Appendix B (Applicable Inland Native Fish Strategy Standards and Guidelines).

The Selected Alternative would comply with Forest Plan standards and Regional Soil Quality standards related to detrimentally disturbed soils (EA, p. 3-169, 3-170).

The Selected Alternative is consistent with Forest Plan management direction, goals, objectives, standards and guidelines for the management protection of wildlife species (EA, pp. 3-227 through 3-229).

Under the Selected Alternative, the requirements for surveys and implementation of mitigation measures will ensure activities meet the intent of the Forest Plan for Threatened, Endangered, and Sensitive plant species (EA, p. 3-248) and noxious weeds (EA, p. 3-256, 3-257).

Forest-wide goals, objectives and standards for finances are not specifically addressed in the 1987 Forest Plan (EA, p. 3-262). The Forest Plan addressed this issue indirectly under the discussion of community stability. Chapter II of the Forest Plan states, "Management activities will continue to contribute to local employment, income and lifestyles. The Forest will be managed to contribute to the increasing demand for recreation and resource protection while at the same time continuing to provide traditional employment opportunities in the wood products industry. The Selected Alternative will meet this direction (EA, p. 3-262).

The Selected Alternative is consistent with Forest Plan standards for recreation management (EA, p. 3-264), inventoried roadless areas (EA, p. 3-266), and protection of scenic resources (EA, p. 3-268).

## 4.2 Other National Forest Management Act Requirements

The Selected Alternative is also consistent with other NFMA requirements:

- **Maintaining diversity (16 USC 1604[g][3][B]):** The Selected Alternative will have no significant impact to any species, and no loss of viability to populations or species (EA, pp. 3-141 and 3-142 [fish], 3-229 [wildlife]).
- **Soil, slope or other watershed conditions (16 USC 1604[g][3][E][i] and protection for streams and other bodies of water (16 USC 1604[g][3][E][iii]):** The design of fuels reduction treatments and road work include features designed specifically to protect water, soils, and fisheries, including criteria for road reconstruction and maintenance. There will be no irreversible damage to soil, slope, or other watershed conditions. Implementation will be based on use of Best Management Practices and design features to protect wetlands, seeps, bogs, wallows and springs.
- **Restocking and vegetation manipulation (16 USC 1604[g][3][E][ii]):** Technology and knowledge does exist to ensure that lands are adequately restocked within five years after final harvest, which is a requirement of the Selected Alternative (EA, pp. 2-6, 3-74). Effects on residual trees and adjacent stands have been considered (EA, pp. 3-74, 3-75).
- **Economic factors (16 USC 1604[g][3][E][iv]):** Management of the Idaho Panhandle National Forests (IPNF) has the potential to affect local economies (EA, p. 3-259). People are an important part of the ecosystem. Use of resources and recreational visitation to the Forest generate employment and income in the surrounding communities and counties, and generate revenues that are returned to the federal treasury. NEPA requires that consequences to the human environment be analyzed and disclosed, based on issues. NEPA does not require a monetary benefit-cost analysis. Economic factors were considered, and the Selected Alternative does have economic value associated with timber volume (EA, p. 3-261, Table 3-FIN-1). The level of timber harvest is important not only in providing jobs in the timber industry, but also through indirect and induced impacts on other business sectors as well. The Selected Alternative may bring the local economy some increased relative stability during the life of the project, and contribute to the gross receipts to the counties (EA, p. 3-262). However, the Selected Alternative was chosen primarily for the reasons documented in this decision (reducing fuels, increasing forest resiliency, and maintaining or improving wildlife habitat) and not because of economic value.
- **Clearcutting and even-aged management (16 USC 1604[g][3][F]):** All treatments are silviculturally appropriate and are within the timber and vegetation practices outlined in the Forest Plan; no clearcutting would occur under the Selected Alternative (EA, p. 3-75). Forest Service policy directs land managers to normally limit the size of areas treated by even-aged silviculture methods to 40 acres or less (EA, Appendix H). The Selected Alternative includes areas of treatment that, when considered with adjacent even-aged management treatment areas, would exceed the 40-acre opening size (this includes areas of variable retention shelterwood). A request to exceed the 40-acre size limitation on specific regeneration harvests has been approved in accordance with FSM 2470.1 as described by Section 6 of the National Forest Management Act, which requires that harvests designed to regenerate an even-aged stand of timber are subject to established maximum size limits (16 USC 1604 (g) (3) (F) (iv) and 36 CFR 219.27 (d) (2)). Project design includes features to protect forest vegetation (EA, p. 2-5), soils (EA, p. 2-6), and aquatic resources (EA, p. 2-8).
- **Suitability for timber production (16 USC 1604[k]):** Harvest will not occur on sites identified as not suitable for timber production (EA, p. 3-75).
- **Temporary roadways (16 USC 1608[b]) and standards of roadway construction (16 USC 1608[c]):** NFMA requires that the necessity of roads be documented and that road construction be designed to standards appropriate for the intended uses, considering safety, cost of transportation, and impacts on land and resources (16 USC 1608). NFMA also requires that roads are planned and designed to re-establish vegetation cover on the disturbed areas within a reasonable period of time, not to exceed 10 years unless the road is determined necessary as a permanent addition to the National Forest Transportation System (16 USC 1604, Sec. 8). The Roads Analysis Process (RAPs) was used to identify the condition of (and recommendations for) each road system in the project area (EA, p. 2-3; PF Doc. TRAN-1). Under the Selected Alternative, no new system roads will be constructed in the Blue Alder Resource Area. Just over one mile of temporary road will be constructed to allow access to harvest units (EA, p. 2-5, Table 2-0). The construction will be completed using Best Management Practices to protect soil and aquatic resources (EA, pp. 2-6 through 2-8). At the completion of its intended use, the temporary roads will be recontoured (EA, p. 2-3).

Potential physical, biological, aesthetic, cultural, engineering and economic impacts of the Selected Alternative have been assessed and are disclosed in the Environmental Assessment with supporting information in the Project Files.

### 4.3 Healthy Forests Restoration Act

Activities meet the requirements for authorization under the Healthy Forests Restoration Act (EA, Appendix F), including:

- **Section 102 (a) describes locations on Federal land where hazardous fuel reduction projects are appropriate (for example, wildland-urban interface areas; condition class 2 and 3, lands where wildfire would have adverse effects on a municipal water supply or the maintenance of the system; where there is windthrow or blow down, ice storm damage, epidemic disease or insects on or adjacent to federal land; or on federal land with threatened and endangered species habitat that is at risk to catastrophic wildfire).** The Blue Alder Resource Area is entirely within the Wildland Urban Interface Area as defined by the Kootenai County Fire Mitigation Plan (EA, p. F-2).
- **Section 102 (b) requires that proposed HFRA actions be consistent with applicable resource management plans and must be on lands managed by the USDA Forest Service or DOI BLM.** All of the lands within the project area boundary are National Forest System lands managed by the Coeur d'Alene River Ranger District of the Idaho Panhandle National Forests (EA, p. F-2).
- **Section 102 (d) specifies that hazardous-fuel treatment projects cannot take place in wilderness or wilderness study areas, or in areas where removal of vegetation is prohibited by an act of Congress or Presidential proclamation.** There are no lands in or adjacent to the Blue Alder Resource Area designated as wilderness or wilderness study areas. Proposed activities are not in any area where removal of vegetation is prohibited (EA, p. F-2).
- **Section 102 (e) requires that an authorized project fully maintain or contribute toward the restoration of the structure and composition of old growth stands.** The Blue Alder old-growth analysis included a complete review of current field data and collection of new data to locate additional old growth meeting old-growth standards (EA, p. F-3). No additional stands of old growth were found. Activities under the Selected Alternative will fully maintain the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type, taking into account the contribution of the stands to landscape fire adaptation and watershed health, and retaining the large trees contributing to old growth structure (EA, p. F-3).
- **Section 102 (f) requires that an authorized project focus largely on small-diameter trees, thinning, strategic fuel breaks, and prescribed fire; maximizing the retention of large trees.** 'Large' and 'small' as descriptors for trees are subjective terms and the definitions for large or small trees is not found in HFRA (EA, p. F-4). Instead, HFRA section 102(e)(2) states vegetative conditions are to be 'characteristic of forest type.' Using local area forest type characteristics, 21 inches diameter at breast height can be considered large (EA, p. 3-77). Under the Selected Alternative, harvest activities include removal of small to mid-sized trees and, in limited cases, large trees when they are not appropriate for the forest type, to the extent that the trees do not promote fire-resilient stands (HFRA section (f)(1)(B), EA, p. 3-77). Retention most often represents the largest and healthiest trees available, while harvesting smaller, less resilient trees.
- **Section 104 (c) and (d) address consideration of alternatives, particularly for projects in the wildland-urban interface.** Three alternatives were analyzed for disclosure in the EA: Alternative 1 is the No-Action Alternative (to demonstrate the effects of failing to implement the project), Alternative 2 is the Proposed Action Alternative (the agency's proposed alternative), and Alternative 3 was developed in response to public concerns, to demonstrate the benefits vs. risks of constructing two new road segments (EA, p. 2-4). The range of alternatives is consistent with requirements under HFRA which state: "For an authorized hazardous fuel reduction project that is proposed to be conducted in the wildland-urban interface, the Secretary is not required to study, develop, or describe more than the proposed agency action and 1 action alternative in the environmental assessment" (HFRA section (d)(1)).

- **Section 104 (e), (f) and (g) encourage meaningful public participation, including collaboration and public comment. Agencies must provide notice of the project and conduct a public meeting when preparing authorized hazardous fuel-reduction projects.** In 2005, the Coeur d'Alene Chamber of Commerce, in cooperation with the Idaho Panhandle National Forests, sponsored a facilitated collaborative forum which has evolved into the Coeur d'Alene Forestry Coalition (EA, p. G-1). All interested publics who normally express interest in our projects were contacted and invited to participate in the collaborative process. Meetings held by the Coalition were open to the public.

After reviewing potential project collaboration opportunities across the Coeur d'Alene River Ranger District in May 2006, the Coalition committed to working with the Forest Service in addressing hazardous fuels reduction and other restoration activities in the Blue Alder Resource Area (EA, p. G-2). Over the last two years, including over 20 meetings and 5 field trips, Coalition participants engaged the Forest Service in developing the need for action and the proposed action to address those needs. The collaborative interface provided many benefits, including development of meaningful and respectful relationships between Coalition participants despite divergent perspectives and interests; information exchange on critical land management issues in the Blue Alder Resource Area, relevant science, and the evolution of the Blue Alder proposal from concept to recommended management actions; and, upfront resolution on several key issues (EA, pp. G-4, G-5).

#### 4.4 Consistency with Other Laws, Regulations and Policy

**Clean Air Act:** The Idaho Panhandle National Forests is a member of the Montana/Idaho Airshed Group, which is composed of members who conduct a “major” amount of prescribed burning and the regulatory and health agencies that regulate this burning. The intent of the Airshed Group is to minimize or prevent smoke impacts while using fire to accomplish land management objectives and/or fuel hazard reduction. The monitoring unit of the Montana/Idaho Airshed Group coordinates burning and smoke emissions to minimize smoke accumulation and provides smoke dispersion forecasts and air quality monitoring support for burners in the Airshed Group. Daily during the burning season, burners post proposed burns before 11:00 am; the monitoring unit considers proposed burns together with expected ventilation or smoke dispersion conditions and existing air quality to determine burn recommendations for the following day (with concurrence from the Idaho Department of Environmental Quality). These procedures limit smoke accumulations to legal, acceptable limits. The District strictly complies with these procedures, and has had no air quality violations (EA, p. E-2, E-3). Although prescribed burning creates smoke that contains particulate matter, activities proposed under the Selected Alternative will substantially reduce the particulate matter emissions of potential wildfires (EA, p. 3-21; PF Doc. FF-42).

**Clean Water Act:** The Selected Alternative is consistent with the requirements of the Clean Water Act (33 USC §1251). Past watershed restoration work in all watersheds have reduced potential sediment loads to these streams. As such, sediment reduction allocations from National Forest lands for the Wolf Lodge Basin have been met and exceeded (Attachment B – Decision Notice Errata and Changed Conditions, including response to Idaho Department of Environmental Quality (PI-37)). Sediment, temperature and nutrients (the pollutants of concern) will not have a measurable increase in the water quality-limited segment in the Blue Creek or Wolf Lodge basins. Risks to beneficial uses in Blue, Stella, Wolf Lodge, Marie, Alder and Cedar Creeks will not be changed by this project. In compliance with the current TMDL status, there will be no net increase in sediment through management activities into streams in the Wolf Lodge Basin (EA, p. 3-142 and PF AQ-03a).

**Idaho Forest Practices Act:** The Forest Practices Act was passed by the 1974 Idaho Legislature to assure the continuous growing and harvesting of forest trees and to maintain forest soil, air, water, vegetation, wildlife, and aquatic habitat (EA, p. 3-142). The Act requires that federal land practices must meet or exceed the requirements of the state rules. Best Management Practices (EA, Appendix A) or Soil and Water Conservation Practices (PF Doc. AQ-R34) will be applied under the Selected Alternative. All activities are in compliance with the guidelines in the Soil and Water Conservation Handbook (EA, p. 3-142).

**State of Idaho Governor’s Bull Trout Plan:** The mission of the Governors Bull Trout Plan (1996; PF Doc. AQ-11) is to “...maintain and or restore complex interacting groups of bull trout populations throughout their native range in Idaho,” (EA, p. 3-142). No bull trout population in the Wolf Lodge basin system is known to currently persist based on all the information available at the time of this analysis. The Plan does not identify Blue Creek or Wolf Lodge drainage area as a key watershed for a bull trout metapopulation (EA, p. 3-142).

**Presidential Executive Order 12962 (Recreational Fishing):** This order directs federal agencies to “improve the quantity, function, sustainable productivity, and distribution of aquatic resources for increased recreational fishing opportunity by evaluating the effects of federally funded, permitted, and authorized actions on aquatic systems and recreational fisheries and document those effects relative to the “purpose” of the order (EA, p. 3-142). The Selected Alternative will produce an immeasurable, potential short-term increase in sediment yield (EA, p. 3-129), and no measurable increases in water yield or peak flow, or delay of watershed recovery (EA, p. 3-129, Table 3-AQ-11). The impacts may effect individual westslope cutthroat trout, but would not lead toward a trend in federal listing (EA, p. 3-142).

**Endangered Species Act:** Section 7 of the Endangered Species Act directs that actions authorized, funded, or carried out by federal agencies do not jeopardize the continued existence of any Threatened or Endangered species, or result in adverse modification of habitat critical to these species. The Selected Alternative is in compliance with the Endangered Species Act as amended.

Bull trout are identified as a threatened species under the Endangered Species Act (EA, p. 3-114). Fisheries surveys conducted over the last 30 years in the subwatersheds that comprise the Blue Alder Resource Area have documented that bull trout do not occupy any part of the Wolf Lodge Basin (EA, p. EA-142). Critical habitat has been established for bull trout, but does not include any part of the Blue Alder cumulative effects analysis area. There will no effect to fish populations or habitat. (EA, p. 3-142)

The Blue Alder Resource Area does not provide critical habitat for any Threatened or Endangered wildlife species (EA, p. 3-179), so there is little to no probability of their occurrence in the resource area (EA, p. 3-180).

Two species of Threatened plants are listed by the US Fish & Wildlife Service for the Coeur d’Alene River Ranger District (EA, p. 3-248). Although there is potentially suitable habitat, no Threatened species have been discovered on Forest Service lands. There are no Endangered plant species currently listed for the IPNF or Coeur d’Alene River Ranger District (EA, p. 3-248).

**Migratory Bird Treaty Act:** This Act directs agencies to ensure that environmental analyses evaluate the effects of federal actions on migratory birds, with emphasis on species of concern (EA, p. 3-175). This was done, as documented in the EA (pp. 3-181, 3-226, and 3-229).

**National Historic Preservation Act:** All known heritage resource sites will be protected as directed by the Cultural Resources Management Practices (EA, p. E-3). Any future discovery of heritage resource sites would be inventoried and protected in accordance with the National Historic Preservation Act if found to be of cultural significance. Specific contract provisions will be used to ensure protection of cultural sites (EA, p. 2-9).

**36 CFR Part 294, Special Areas; Roadless Area Conservation; Applicability to the National Forests in Idaho, and Wilderness Act of 1964:** Under the Selected Alternative, prescribed burning for fuel reduction purposes within the Skitwish Roadless Area are consistent with these mandates (EA, pp. 3-265, 3-266). No cutting, sale, or removal of timber, road construction, or road reconstruction will occur in the Skitwish Roadless Area under the Selected Alternative (EA, p. 3-266).

**Environmental Justice Act:** The Selected Alternative was assessed to determine whether it would disproportionately impact minority or low-income populations, in accordance with Executive Order 12898. Based on the composition of the affected communities and the cultural and economic factors, the Selected Alternative would have no adverse effect to minority, low income, or any other segments of the population (EA, pp. 3-260, E-3).

**Best Available Science:** The need to employ the best science is not new, since agency decisions have always required a sound technical basis. What constitutes best available science might vary over time and across scientific disciplines. The Blue Alder project file demonstrates a thorough review of relevant scientific information, a consideration of responsible opposing views, and the acknowledgement of incomplete or unavailable information, scientific uncertainty and risk, as appropriate.

## 5. Finding of No Significant Impact (FONSI)

I have reviewed the direct, indirect and cumulative effects of the project activities as documented in this Decision Notice, the Environmental Assessment (Chapter 3 and Appendices), and the Project File. The setting of this project is in a localized area, with implications only for the landscape, drainages and stands in the analysis area. My consideration of the Selected Alternative is based on its impact on the ecosystem, local communities, county, and at the affected resource level. It does not have any large or lasting effect on society as a whole, the nation, or the state.

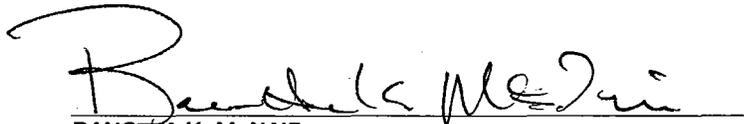
I find that there are no significant beneficial or adverse impacts on the physical, biological, or social portions of the human environment, and therefore an environmental impact statement will not be prepared. Please refer to the Finding of No Significant Impact (Attachment A).

## 6. Documents and Project Files

This Decision Notice summarizes analyses that have led to this point in the process. More reports and analyses documentation have been referenced or developed during the course of this project and are part of the Project Files. All project files for the Blue Alder Resource Area project are available for review by the public. The project files may be reviewed at the Fernan Office of the Coeur d'Alene River Ranger District, or are available on compact disk upon request. To review the files, please contact the Coeur d'Alene River Ranger District (Fernan Office), (208) 664-2318.

## 7. Appeal Rights and Implementation

This decision is not subject to appeal pursuant to 36 CFR 218.10(b)(2). I am the Responsible Official for this decision. For more information regarding this project, contact District Ranger Randy Swick or Ecosystems Staff Officer Sherri Lionberger at the Fernan Office of the Coeur d'Alene River Ranger District, (208) 664-2318.



RANOTTA K. McNAIR  
Forest Supervisor,  
Idaho Panhandle National Forests

2-13-09

Date

## ATTACHMENT A

### Finding of No Significant Impact (FONSI)

The Blue Alder Resource Area is in the Wildland Urban Interface (WUI), and as such, uncontrolled wildfire poses a threat to life and property. Based on Kootenai County GIS data there are approximately 196 private structures within a mile of the Resource Area, with new development in the planning stages. Various infrastructure such as roads, power lines, a natural gas pipeline, and Interstate 90 are near the Resource Area. An uncontrolled wildland fire in the WUI could threaten lives, homes, infrastructure, air quality, and tourism. A deficit in the number of naturally occurring fires in this area has led to increased fuel loading, changes in stand structure, and changes in species composition. Overall, this deficit has led to increased potential for large, intense, severe fires which could threaten lives and the wildland urban interface values which are particularly prevalent near the Blue Alder Resource Area. A severe wildfire could result in the loss of environmental values such as forest cover, soil productivity, water quality and visual quality. Financial losses could include homes, timber value, and fisheries. Based on the current conditions, which have resulted from the exclusion of wildfire and past harvesting practices, there is a need to reduce fuels and increase early seral species such as western larch and ponderosa pine which will increase forest resiliency and reduce the wildland fire threat.

In contrast to current conditions, desired future conditions in the Blue Alder Resource Area would include a considerable reduction in hazardous fuels, both at the stand and landscape scales. This reduction in fuels would allow for the protection of human life and property, as directed in the IPNFs (1987) Forest Plan (Fire Management Standard 2b, Page II-38). Stand-level reductions in hazardous fuels will reduce fire intensity, severity, and resistance to control, while landscape-level fuel reduction would slow the spread of large fires. The desired future condition would reduce the risks of fires burning from the forest and into communities, but would also reduce the risk of fires starting near the community and burning uncontrolled into the forest. The Blue Alder Resource Area would consist of a variety of structural stages, limiting landscape fuel homogeneity which would limit the spread of fires in many conditions. In this landscape, both the WUI values and the environmental values such as forest cover, wildlife habitat, soil productivity, water quality, visual quality, and timber values would be protected. Objectives of the project are to:

- *Reduce hazardous fuels in the wildland interface*
- *Establish and maintain long lived early seral species and resilient structure*
- *Maintain and improve dry-site wildlife habitat*

Three alternatives were considered in detail - the No-Action Alternative and two action alternatives. **Alternative 1**, the No-Action Alternative, represents the current and expected future condition given the past, ongoing and reasonably foreseeable activities (EA, Section 2.2.2). **Alternative 2**, the Proposed Action, was developed to respond to current stand conditions and trend them towards the desired future condition. The proposed action includes prescribed burning to reduce fuels and maintain dry-site wildlife habitat, stand rehabilitation, timber harvesting, pre-commercial thinning, and road decommissioning. The areas proposed for treatment integrate multiple objectives concentrating vegetative treatments to maximize the efficiency and effectiveness of benefits. Under Alternative 2, new system road construction was proposed to access treatment units in an economically viable manner. During the collaborative process, Idaho Conservation League and The Lands Council expressed concerns with adding to the current road system. Their concerns were based on road maintenance backlogs and declining budgets for road maintenance.

**Alternative 3** was developed to address the concerns raised by Idaho Conservation League and The Lands Council. Alternative 3 does not include new system road construction and consequently has resulted in a reduction of 243 acres of commercial harvesting.

The Forest Service prepared the environmental assessment (EA) to determine whether or not implementing the activities proposed under either action alternative would result in significant effects warranting preparation of an environmental impact statement (EIS). Based on the information disclosed in the EA and associated project files, the Responsible Official chose Alternative 3 as the **Selected Alternative**, and determined that the Selected Alternative would **not** have a significant effect on the quality of the human environment based on the context and intensity of its impacts (40 CFR 1508.27). Therefore, an EIS will not be prepared. The following disclosures support the finding of no significant impact.

## A. Context

The significance of an action must be analyzed in several contexts, such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than the world as a whole. Both short- and long-term effects are relevant (40 CFR 1508.27).

The Blue Alder Resource Area EA is a project-level analysis. Its scope is confined to addressing the significant issues and environmental effects of the project, and the context of this proposal is limited to the locale of the Blue Alder Resource Area. Project activities are limited to the specific fuel and vegetation treatments proposed on National Forest System lands in the Blue Alder Resource Area, although some analyses (such as aquatics and wildlife) considered the extent of effects beyond the project boundaries. While substantially improving hazardous fuels conditions and reducing potential wildfire intensities in the local area and watershed, the Selected Alternative would **not** pose any significant short- or long-term effects. Design features (described in the EA, Chapter 2) would limit adverse effects to such an extent that any adverse impacts are almost undetectable and immeasurable, even at the local level (EA, Chapter 3).

## B. Intensity

This refers to the severity of the impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following are considered in evaluating intensity (40 CFR 1508.27):

1. Impacts may be both beneficial and adverse. A significant effect may exist even if, on balance, effects are believed to be beneficial.

and

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

The Selected Alternative will make substantial progress toward reducing potential intensities of wildfire and trending stands away from potential fire behavior that could threaten human life and property. There will also be a trend to establishing and maintaining long-lived early seral species and structure (EA, p. 2-1). Impacts to other resources as a result of implementing activities under the Selected Alternative would be negligible:

- *While there will be direct and indirect effects to sensitive plants, there will not be a trend to federal listing or loss of species or habitat (EA, p. 3-248). Activities will meet Forest Plan standards and legal mandates.*
- *Existing infestations of certain weed species may continue to increase on Federal lands within the project area and adjacent private lands; activities will minimize (but not eliminate) the risk of weed spread by application of design features (EA, p.3-254).*
- *There will be no direct or indirect effects to fish habitat or populations based on water yield interpretation, because modeled increases are within the historic range of variability for magnitude, intensity and duration when compared with what naturally occurred in these subwatersheds (EA, p. 3-138).*
- *Activities will reduce the potential severity of effects that a wildfire would have on soils, because there would be a reduction in the tons per acre of fuels on treated sites (EA, p. 3-159). With implementation of mitigation measures for soils, the soil-disturbing activities will not exceed Regional or Forest Plan standards.*
- *Effects to wildlife species vary; habitat conditions that favor one species may be detrimental to another. However, design features of the Selected Alternative will minimize impacts to any given species in the Blue Alder Resource Area (EA, pp.3-183 through 3-226); there will be no loss of viability to populations or species. The long-term benefits to wildlife will outweigh the short-term disturbance to species during project activities.*
- *Activities under the Selected Alternative will have little effect on recreation. Marie Creek Trail will only briefly be affected by prescribed burning on some open slopes north of the trail. Access to the Forest will remain unchanged from the existing condition. However, activities will facilitate closure of illegal access routes created by ATVs. The physical blocks coupled with the travel management plan should help in reducing the access problems (EA, p. 3-264).*

- *Cumulatively, the collective scenic effects of the Action Alternatives for the Blue Alder Resource area are negligible and will meet the Forest Plan standards established for this area (EA, p. 3-268).*

For these reasons, there will be no significant beneficial, adverse or cumulative effects to resources under the Selected Alternative.

## **2. The degree of effects on public health or safety.**

The reduction in fire fuels under the Selected Alternative will would begin to trend stands away from potential fire behavior that could threaten human life and property in and near the resource area (EA, p. 3-33). Risk of smoke intrusion into Class I airsheds or non-attainment areas from prescribed burning in the Resource Area will be minimal due to distance and prevailing winds (PF Doc. FF-42). All burning will comply with federal, state and local regulations (EA, pp. 3-31 through 3-33). For these reasons, there will be no significant effects on public health and safety under any action alternative. The Idaho Panhandle National Forests is a member of the Montana/Idaho Airshed Group, which is composed of members who conduct a “major” amount of prescribed burning and the regulatory and health agencies that regulate this burning. The intent of the Airshed Group is to minimize or prevent smoke impacts while using fire to accomplish land management objectives and/or fuel hazard reduction. The monitoring unit of the Montana/Idaho Airshed Group coordinates burning and smoke emissions to minimize smoke accumulation and provides smoke dispersion forecasts and air quality monitoring support for burners in the Airshed Group. Daily during the burning season, burners post proposed burns before 11:00 am; the monitoring unit considers proposed burns together with expected ventilation or smoke dispersion conditions and existing air quality to determine burn recommendations for the following day (with concurrence from the Idaho Department of Environmental Quality). These procedures limit smoke accumulations to legal, acceptable limits. The District strictly complies with these procedures, and has had no air quality violations (EA, pp. E-2, E-3). Although prescribed burning creates smoke that contains particulate matter, activities proposed under the Selected Alternative will substantially reduce the particulate matter emissions of potential wildfires (EA, p. 3-21; PF Doc. FF-42).

## **3. Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas.**

No parklands, prime farmlands, wild and scenic rivers or ecologically critical areas will be affected by activities under the Selected Alternative. The project area has been surveyed and analyzed for historic and cultural resources (PF Doc. HR-01). Results of that work indicate that the Selected Alternative will not have any effect on any historical or cultural resources (PF Doc. HR-01). With regard to wetlands, the Selected Alternative will exclude all Riparian Habitat Conservation Areas (RHCAs) from commercial treatment areas, consistent with Forest Plan guidelines (EA, p. B-1) as amended by the Inland Native Fish Strategy (PF Doc. CR-003), and state and federal law. These design features will reduce riparian impacts to the extent that the Selected Alternative will not pose any significant impacts to wetlands or riparian areas within the Blue Alder Resource Area.

## **4. The degree to which the effects on the quality of the human environmental are likely to be highly controversial.**

As used in the Council on Environmental Quality’s guidelines for implementing NEPA, the term “controversial” refers to whether substantial dispute exists as to the **size, nature or effect of the major federal action**, rather than the existence of opposition to a use. Extensive public scoping and an extended period of interaction between the project interdisciplinary team and interested individuals, groups and agencies was an integral part of this EA. Review of public input, potential issues raised in scoping of the proposed action, and the standards, guidelines and design features related to the proposed action have resulted in a limited and focused proposed action. The effects of the activities in the Blue Alder Resource Area on the quality of the human environment are not highly controversial as defined by the Council on Environmental Quality.

## **5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.**

Activities under the Selected Alternative are similar to other fuel reduction projects that have been implemented without significant impacts on the Coeur d’Alene River Ranger District and other districts of the Idaho Panhandle National Forests. Documentation of past successes with similar projects can be found in the IPNFs’ annual monitoring reports (PF Doc. CR-004 through CR-018, CR-022). Design features will minimize potential impacts. The Selected Alternative is consistent with management direction provided by the Forest Plan.

**6. The degree to which the action may establish precedent for future actions with significant effects or represents a decision in principle about a future consideration.**

Actions under the Selected Alternative will not establish a precedent for any future action, nor will it represent a decision in principle about a future consideration.

**8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural or historical resources.**

A record search, field survey, and resource inventory Cultural Resource Report have been completed for this project in compliance with Section 106 of the Historic Preservation Act (PF Doc. HR-01). Assessment of historic and cultural resources in the Blue Alder Resource Area indicates implementation of this project will not affect any heritage resource eligible for listing in the National Register of Historic Places, nor will it cause loss or destruction of any significant cultural or historical resources. If any new cultural resources are discovered during project implementation, operations will cease in the area of discovery until adequate protection measures have been agreed upon with the State Historic Preservation Office.

**9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act (ESA) of 1973.**

The Selected Alternative was designed to be implemented in a manner that will protect wildlife resources in the Blue Alder Resource Area (EA, p. 2-1). There will be no significant impact to any species, and no loss of viability to populations or species (EA, p. 3-179). The long-term benefits to wildlife will outweigh the short-term disturbance to species during project activities.

**10. Whether the action threatens a violation of Federal, State or local law or requirements imposed for the protection of the environment.**

**National Forest Management Act and IPNF (1987) Forest Plan:** The Selected Alternative is consistent with the NFMA and other applicable federal, state and local laws that protect the environment, including the Forest Plan, as amended. Activities in the Blue Alder Resource Area are consistent with the Forest Plan because they would help to reduce the risk of uncharacteristically intense fire and associated risks to life, property, and natural resources; and reduce the danger to fire suppression crews. All management activities will be in compliance with management area direction, including goals and objectives, as described for each resource in the EA, Chapter 3.

Prescribed burning (with no associated harvest) will occur in four areas (75 acres) of allocated old growth in OGMUs 328, 329 and 330; and a commercial thin from below will occur in one area (33 acres) of allocated old growth in OGMU 330. The prescribed burning (without harvest) represents dry Douglas-fir habitat types; the objective of the burning is to reduce fuel accumulations without loss of large trees. The burning is not expected to change old growth allocation (EA, p. 3-58). The commercial thinning in allocated old growth is in a stand with dry habitat type areas (with very large, old ponderosa pine) in a mosaic with moist habitat types. The treatment area is adjacent to private lands, structures, Interstate 90, a natural gas pipeline, and power lines. With such development comes the risk of human-caused fires in addition to natural ignitions, either of which threaten WUI and forest values (EA, pp. 3-2, 3-60, 3-68). Harvest in the allocated old growth will not change old growth allocation status (EA, p. 3-61). The Selected Alternative complies with all Forest Plan old growth standards (EA, pp. 3-66 through 3-70). A thorough review of the OGMUs associated with the Blue Alder Resource Area (28,709 acres) was conducted to locate areas of additional old growth that would meet Forest Plan old growth definitions and standards; none were found (EA, pp. 3-41 and 3-52). This information as well as screening for old growth characteristics of all activity units is found in the project file (PF Docs. VEG-31 through VEG-37).

NFMA consistency requirements include the need to protect species viability and management indicator species' habitat. The Selected Alternative was designed to be implemented in a manner that would protect wildlife and fisheries resources in the Blue Alder Resource Area (EA, pp. 3-229, 3-141). There will be no significant impact to any species, and no loss of viability to populations or species. The long-term benefits will outweigh the short-term disturbance to species during project activities. Technology and knowledge exists to ensure that lands are adequately restocked within five years after final harvest. Effects on residual trees and adjacent stands have been considered. Harvest will not occur on sites identified as not suitable for timber production. All treatments that will occur are silviculturally appropriate and within the timber and vegetation practices outlined in the Forest Plan. Potential physical, biological, aesthetic, cultural, engineering and economic impacts of the Selected Alternative have been assessed and are disclosed in the EA (Chapter 3) with supporting information in the Project Files.

**Healthy Forests Restoration Act:** The Blue Alder project was originally conceived out of collaboration with the Kootenai County Wildland Urban Interface (WUI) Task Force, and has gone through extensive collaborative efforts, which are described in the EA (Appendix G). Activities in the Blue Alder Resource Area meet the requirements for authorization under the Healthy Forests Restoration Act (EA, Appendix A). The project was initiated by the Coeur d'Alene River Ranger District in response to the Kootenai County Fire Mitigation Plan. The County Fire Mitigation Plan recognizes the threat that wildfires pose to the county, and recommends management that would decrease this risk (EA, p. 1-1). A collaborative process was used in developing the Blue Alder Resource Area proposal and involved members of the conservation community, timber industry, adjacent landowners and interested members of the public.

'Large' and 'small' as descriptors for trees are subjective terms and the definitions for large or small trees is not found in HFRA (EA, p. F-4). Instead, HFRA section 102(e)(2) states vegetative conditions are to be 'characteristic of forest type.' Using local area forest type characteristics, 21 inches diameter at breast height can be considered large (EA, p. 3-77). Under the Selected Alternative, harvest activities include removal of small to mid-sized trees and, in limited cases, large trees when they are not appropriate for the forest type, to the extent that the trees do not promote fire-resilient stands (HFRA section (f)(1)(B); EA, p. 3-77). Retention most often represents the largest and healthiest trees available, while harvesting smaller, less resilient trees.

**Clean Water Act:** The Selected Alternative is consistent with the requirements of the Clean Water Act (33 USC §1251). Past watershed restoration work in all watersheds have reduced potential sediment loads to these streams. As such, sediment reduction allocations from National Forest lands for the Wolf Lodge Basin have been met and exceeded (Attachment B, Errata Sheet), including response to Idaho Department of Environmental Quality comments (PF Doc. PI-37). Sediment, temperature and nutrients (the pollutants of concern) will not have a measurable increase in the water quality-limited segment in the Blue Creek or Wolf Lodge basins. Risks to beneficial uses in Blue, Stella, Wolf Lodge, Marie, Alder and Cedar Creeks will not be changed by this project. In compliance with the current TMDL status, there will be no net increase in sediment through management activities into streams in the Wolf Lodge Basin (EA, p. 3-142; PF Doc. AQ-03a).

**Endangered Species Act:** Section 7 of the Endangered Species Act directs that actions authorized, funded, or carried out by federal agencies do not jeopardize the continued existence of any Threatened or Endangered species, or result in adverse modification of habitat critical to these species. The Selected Alternative is in compliance with the Endangered Species Act as amended.

Bull trout are identified as a threatened species under the Endangered Species Act (EA, p. 3-114). Fisheries surveys conducted over the last 30 years in the subwatersheds that comprise the Blue Alder Resource Area have documented that bull trout do not occupy any part of the Wolf Lodge Basin (EA, p. 3-142). Critical habitat has been established for bull trout, but does not include any part of the Blue Alder cumulative effects analysis area. There will be no effect to fish populations or habitat (EA, p. 3-142).

The Blue Alder Resource Area does not provide critical habitat for any Threatened or Endangered wildlife species (EA, p. 3-179), so there is little if any probability of their occurrence in the resource area (EA, p. 3-180).

Two species of Threatened plants are listed by the US Fish & Wildlife Service for the Coeur d'Alene River Ranger District (EA, p. 3-248). Although there is potentially suitable habitat, no Threatened species have been discovered on National Forest System lands. There are no Endangered plant species currently listed for the IPNF or Coeur d'Alene River Ranger District (EA, p. 3-248).

**Migratory Bird Treaty Act:** Although some current habitat may be lost over the short term as a result of activities under the Selected Alternative, taking no action could have similar effects (EA, p. 3-229). Efforts to trend stands in the resource area toward historic species composition and age structure and to maintain the ecological processes that created these conditions will eventually benefit nongame and land bird species.

**Environmental Justice:** In accordance with Executive Order 12898, the Selected Alternative was assessed to determine whether it would disproportionately impact minority or low-income populations. No impacts to minority or low-income populations were identified during scoping or any other portion of public involvement during the course of this analysis. Based on this, the Selected Alternative will comply with Executive Order 12898.

## **ATTACHMENT B**

### **Errata Sheet**

This attachment provides a listing of corrections to five pages of the Blue Alder Resource Area Environmental Assessment (EA). The changes were determined to not affect the conclusions presented in the EA, and were reviewed by the Responsible Official prior to signing of the Decision Notice.

#### Page

#### Description of the Correction

- 2-2 It was brought to our attention that in the Environmental Assessment on pg. 2-2 there is an oversimplified statement that was not consistent with the prescription that was analyzed in the forest health section: "This prescription will require that 40 percent of a harvest unit will not have any harvesting activities and 60 percent of the harvest unit will have limited retention of vegetation ranging from individual trees to large clumps of trees."
- Clarification of the intent of the prescription can be found on page 3-59 of the Environmental Assessment: "The arrangement of retained components would be highly variable. Overall residual area retention would range between 35-45 percent." Additionally, Project File Document VEG-18 contains the draft silvicultural prescription that was used internally to conceptualize the final prescription which is described in detail on page 8 of the decision notice.
- 2-6 On page 2-6 under 2.3.3, Features Designed to Protect Threatened, Endangered, and Sensitive Plants, the first sentence should read: "Known Sensitive plant occurrences...would be buffered from harvest and other project-related activities by a minimum of 150 feet."
- 3-72 The fifth paragraph stated: The action alternatives would treat a total of 1,880 acres (21 percent of the resource area), of which about 600 acres (7 percent of the resource area) would be regeneration treatments. The average unit size (harvest plus burn only areas) would be 152 acres (PF Doc. VEG-10). The average regeneration harvest patch size would be 88 acres and the average burn-only patch size would be 90 acres (PF Doc. VEG-10).
- It should have stated: The action alternatives would treat a total of 3,072 acres in alternative 2 and 2,829 acres in alternative 3 (respectively 22 and 21 percent of the resource area), of which 1,522 acres in alternative 2 and 1,279 acres in alternative 3 (7 percent of the resource area) would be regeneration treatments. In terms of the following figures, alternative 2 and alternative 3 are similar. The average unit size (harvest plus burn only areas) would be 52 acres (PF Doc. VEG-10). The average regeneration harvest patch size would be 38 acres and the average burn-only patch size would be 40 acres (PF Doc. VEG-10).
- 3-130 When Blue Creek was originally modeled with WATSED for the EA the construction coefficients were inadvertently applied to the entire road segments being used when they should have only been applied to areas where installation of the drainage structures occurred. The linear length of road affected by construction activities is approximately 0.5 miles. The remaining three and one half miles will only have minor reconstruction (heavy maintenance) such as blading and brushing. Re-running the model reduced the modeled sediment load from 10% as modeled in the EA to 5% as modeled with construction/reconstruction for both Alternative 2 and Alternative 3 (PF Doc. PI-37).
- 3-131 The statement in paragraph two "With the modeled sediment outputs there would be a slight potential of a measurable increase in sediment or delay of watershed recovery". This statement should read "No potential exists for measurable increases in sediment or watershed recovery." This changed because of the re-running of the Watsed model as described on page 3-130.